



Control Number: 51415



Item Number: 453

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0538

PUC DOCKET NO. 51415

2021 MAY -7 PM 3:16

APPLICATION OF SOUTHWESTERN ) BEFORE THE PUBLIC UTILITY  
ELECTRIC POWER COMPANY FOR ) COMMISSION OF TEXAS  
AUTHORITY TO CHANGE RATES )  
) REFERRED TO THE STATE OFFICE  
) OF ADMINISTRATIVE HEARINGS

**SIERRA CLUB’S MOTION FOR RECONSIDERATION, OR IN THE ALTERNATIVE,  
APPEAL OF SOAH ORDER NO. 7 GRANTING SWEPCO’S MOTION TO STRIKE A  
SECTION OF SIERRA CLUB’S DIRECT TESTIMONY**

Sierra Club respectfully requests that the State Office of Administrative Hearings (“SOAH”) Administrative Law Judges (“ALJs”) reconsider Order No. 7 striking portions of Sierra Club’s Direct Testimony. Alternatively, if the Motion for Reconsideration is denied, Sierra Club respectfully appeals Order No. 7 to the Public Utility Commission of Texas (“PUC” or “Commission”) under Tex. Admin. Code § 22.123(a). This motion is timely under 16 Tex. Admin. Code § 22.123(a)(2).<sup>1</sup>

The ALJs’ Order striking portions of Sierra Club’s Direct Testimony was improper for three reasons. *First*, the Order impermissibly decides ultimate issues of fact and law without a hearing and without any evidentiary basis, violating the Administrative Procedure Act (“APA”) and depriving Sierra Club of its right to respond and to present evidence and argument on each issue involved in the case.<sup>2</sup> Specifically, the timing and amount of Southwestern Electric Power

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<sup>1</sup> Order No. 7 was entered on April 27, 2021, and the deadline for filing this appeal is therefore May 7, 2021.

<sup>2</sup> Tex. Gov’t Code § 2001.051 (“In a contested case, each party is entitled to an opportunity . . . to present evidence and argument on each issue involved in the case”); *id.* § 2001.141(c) (administrative decisions must be “based only on the evidence and on matters that are officially noticed”).

Company's ("SWEPCO" or "the Company") capital costs, and whether "any" such expenditures were reasonable, necessary, or prudently incurred are ultimate issues in this case,<sup>3</sup> and it was error to decide those matters on the basis of SWEPCO's attorneys' factual assertions without a hearing or the opportunity to present evidence. *Second*, the Order erroneously precludes Sierra Club from presenting factual evidence and argument challenging the prudence of the Company's ongoing spending at the Flint Creek power plant, which the Company indisputably seeks to recover in rates. *Third*, the Order effectively strips the Commission of its authority to regulate and supervise ongoing utility planning and investments, including the Company's decision to lock its customers into a \$26.8 million retrofits for a power plant that is already high cost compared to alternatives and operates relatively infrequently.<sup>4</sup> Because Order No. 7 "immediately prejudices" Sierra Club's right to present its case and develop evidence supporting its challenge to spending at Flint Creek,<sup>5</sup> Sierra Club respectfully seeks reconsideration. Alternatively, the Commission should reverse the ALJs' Order, allow Sierra Club to present its case, and order the ALJs to base any findings of fact or conclusions of law on the hearing record, as required under the APA.

## **I. SWEPCO'S APPLICATION AND MOTION TO STRIKE**

On October 14, 2020, SWEPCO filed its Application to change its rates based on a test year ending on March 31, 2020. Among other things, SWEPCO seeks to increase its annual

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<sup>3</sup> Preliminary Order, Issues 15, 44, PUC Docket 51415 (Interchange Doc. 117, December 17, 2020).

<sup>4</sup> See Pub. Utilities. Reg. Act. ("PURA") § 14.001 ("The commission has the general power to regulate and supervise the business of each public utility within its jurisdiction and to do anything specifically designated or implied by this title that is necessary and convenient to the exercise of that power and jurisdiction.").

<sup>5</sup> 16 Tex. Admin. Code § 22.123(a)(2).

Texas retail base-rate revenue requirement to \$534,165,103—an increase of approximately \$105,026,238 or 30.31% over its current revenue requirement. SWEPCO also seeks recovery of capital and operations and maintenance (“O&M”) spending at its coal-burning power plants, including the Flint Creek power plant.<sup>6</sup> As part of the Company’s Application, SWEPCO witness Monte McMahon references a “comprehensive list of capital additions” in the Company’s rate schedules, which Mr. McMahon contends were prudently incurred.<sup>7</sup> Schedule H-5.3b to the Application indicates that the Company has already invested significant capital in retrofitting Flint Creek to comply with the U.S. Environmental Protection Agency’s (“EPA”) coal ash and wastewater regulations, also known as the Coal Combustion Residuals Rule and Effluent Limitations Guidelines (“CCR/ELG”).<sup>8</sup>

The Commission’s December 17, 2020 Preliminary Order sets out the issues that “must be addressed” in this proceeding, including the following issues that SWEPCO and Commission Staff each identified in their own list of issues:

**Issue 15:** What amount, if any, of SWEPCO’s invested capital has not previously been subject to a prudence review by the Commission? If there are any such amounts, what are the amounts, for what facilities, property, or equipment were the investments made, and were the amounts prudently incurred? What amount, if any, of allowance for funds used during construction (AFUDC) is being transferred to invested capital in this proceeding? If AFUDC is being transferred, for what facilities and at what rate was the AFUDC accrued?

**Issue 24:** What are SWEPCO’s reasonable and necessary operations and maintenance expenses?

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<sup>6</sup> Direct Testimony of Monte A. McMahon at 17.

<sup>7</sup> *Id.* at 19.

<sup>8</sup> SWEPCO’s rate package indicates that the Company plans to spend \$26.8 million retrofitting Flint Creek, and has already expended \$1,282,613 on the project. *See* Schedule H-5.3b at 7 (line item “FLC U1 DBA Conver (CCR/ELG)” refers to Flint Creek dry bottom ash conversion Coal Combustion Residual/Effluent Limitations Guidelines).



**Issue 44:** Are *any* of SWEPCO's expenditures unreasonable, unnecessary, or not in the public interest, including, but not limited to, executive salaries, advertising expenses, legal expenses, penalties and interest on overdue taxes, criminal penalties or fines, and civil penalties or fines?<sup>9</sup>

To evaluate those issues, Sierra Club and other parties submitted requests for information, asking SWEPCO to clarify the capital and operational expenses at issue in the case. Relevant here, SWEPCO's witness McMahon provided the following discovery response:

Cities Advocating for Reasonable Deregulation ("CARD") Request for Information 1-16: "Provide annual capital expenditures at each SWEPCO power plant for each of the last four calendar years, the test year, and *as requested in rates for the first time in this case.*"

SWEPCO Sponsoring Witness Monte A. McMahon: "For Schedule H-5.3b expenditures broken down by those *requested for the first time in rates and the test year period*, please see CARD 1-16 Supplemental Attachments 1 and 2.xlsx."<sup>10</sup>

Supplemental Attachment 2 to CARD 1-16 is captioned, "Fossil Capital Expenditures," "Requested for the first time in rates," and includes capital investments in retrofitting Flint Creek to comply with EPA's coal ash and wastewater regulations.<sup>11</sup>

Relying on that discovery representation, the Commission's Preliminary Order, and other data SWEPCO produced during discovery, Sierra Club submitted expert testimony challenging the prudence of SWEPCO's decision to invest millions in retrofitting and continuing to operate Flint Creek. Specifically, Sierra Club's evidence indicates that SWEPCO failed to conduct a reasonable evaluation of less costly alternatives to retrofitting and operating the plant, including

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<sup>9</sup> Preliminary Order at 1; *see also* SWEPCO List of Issues to Be Addressed (Interchange Doc. 39, Nov. 12, 2020) (Issue 13, 19.D, 20, 33) Commission Staff Issue List (Interchange Doc. 41, Nov. 12, 2020) (Issue 13, 19.D, 20, 33).

<sup>10</sup> Ex. A (SWEPCO Resp. to CARD RFI 1-16, Supp. Attach. 1 & 2) (emphasis added).

<sup>11</sup> *See id.*, SWEPCO Resp. to CARD RFI 1-16, Supp. Attach. 1, at lines 2-3. The attachment indicates that, of the \$26.8 million total cost, SWEPCO has already expended \$1,282,613 on the Flint Creek project, \$401,395.97 of which was expended during the Test Year.

retiring or converting the plant to burn gas before EPA’s 2028 CCR/ELG compliance deadline, which could save ratepayers millions.<sup>12</sup>

On April 9, 2021, SWEPCO moved to strike those portions of Sierra Club’s testimony. The Company did not dispute that the Company already made a “decision to retrofit Flint Creek,”<sup>13</sup> has invested millions of dollars in the retrofit project before and during the test year,<sup>14</sup> plans to invest a total of \$26.8 million in the project, or that a substantial portion of those retrofit costs could be avoided by retiring or converting the plant to gas before EPA’s 2028 compliance deadline.<sup>15</sup> Instead, SWEPCO’s attorneys insisted that its “decision to retrofit Flint Creek and any associated investment” are irrelevant until some future case “when SWEPCO requests to include such investment in its rate base.”<sup>16</sup>

On April 27, 2021, the ALJs issued Order No. 7 granting SWEPCO’s motion to strike the portion of Sierra Club’s Direct Testimony relating to the prudence of the Company’s decision to retrofit Flint Creek and its continued investments in the plant. In so doing, the ALJs concluded that the retrofit costs referenced in SWEPCO’s rate schedule and response to discovery “had not been moved to SWEPCO’s rate base,” and that “SWEPCO is not seeking to recover” any Flint Creek retrofit costs in this case.<sup>17</sup> The ALJs further concluded “SWEPCO did not make a decision in the test year to retrofit Flint Creek,” and therefore the timing or prudence of that

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<sup>12</sup> See generally Direct Testimony of Devi Glick at 29-40 (Mar. 31, 2021).

<sup>13</sup> SWEPCO Objection and Mot. to Strike, April 9, 2021, at 3.

<sup>14</sup> *Id.* at 3 n.9 (“some CCR/ELG capital expenditures were made prior to 2021”).

<sup>15</sup> See, e.g., SWEPCO Resp. to Sierra Club 3-2, included as Exhibit DG-3 to Direct Testimony of Devi Glick (“[A]n option is available in the rule to allow the plant to cease combustion of coal (i.e., retire or repower) and to continue to operate without further ELG-related retrofits until no later than December 31, 2028.”).

<sup>16</sup> SWEPCO Objection and Mot. to Strike at 3.

<sup>17</sup> Order No. 7 at 5.

decision is not relevant to this case.<sup>18</sup> Finally, the ALJs acknowledged that approximately \$13 million in Flint Creek capital and O&M costs *are* at issue in this case, but nevertheless excluded Sierra Club’s Direct Testimony on the grounds that Sierra Club “offered no legal support” for its expert’s recommendation that those costs be disallowed.<sup>19</sup>

**II. ORDER NO. 7 IS IMPROPER AND IMMEDIATELY PREJUDICES SIERRA CLUB’S RIGHT TO PRESENT EVIDENCE ON THE ISSUES IN THIS CASE, AS IDENTIFIED BY THE COMMISSION.**

Under 16 Texas Administrative Code § 22.123(a)(1), appeals are available for “any order of the presiding officer that immediately prejudices a substantial or material right of a party, or materially affects the course of the hearing, other than evidentiary rulings.” The presiding officer may treat an appeal as a motion for reconsideration and may withdraw or modify the order under appeal prior to a Commission decision on the appeal.<sup>20</sup>

Although Order No. 7 is ostensibly a ruling on an evidentiary motion, the Order improperly decides disputed issues of fact and law related to SWEPCO’s Flint Creek spending decisions without a hearing and without any evidentiary basis, violating the APA, the Commission’s Preliminary Order in this case, and depriving Sierra Club of its right “to respond and to present evidence and argument on each issue involved in the case.”<sup>21</sup> Moreover, the Order erroneously precludes Sierra Club from presenting expert testimony that goes to the prudence of the Company’s ongoing spending at Flint Creek, which is at issue in this case. Accordingly, the ALJs should reconsider the ruling. Alternatively, Commission should reverse Order No. 7. Direct

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<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> *Id.* § 22.123(a)(8).

<sup>21</sup> Tex. Gov’t Code § 2001.051; *see also id.* § 2001.141(c) (administrative decisions must include findings of fact “based only on the evidence and on matters that are officially noticed.”).

the ALJ to admit the entirety of the Direct Testimony of Devi Glick into the hearing record, and allow Sierra Club to develop and submit additional factual evidence and argument addressing the prudence of SWEPCO's spending decisions and any appropriate disallowance, which the Commission's Preliminary Order identified as ultimate issues in this case.<sup>22</sup>

**A. Order No. 7 Improperly Decides Disputed and Ultimate Issues of Fact and Law Without a Hearing and Without An Evidentiary Basis.**

PURA provides that "[i]n a proceeding involving a proposed rate change, the electric utility has the burden of proving that . . . the rate change is just and reasonable."<sup>23</sup> The utility enjoys no presumption of prudence by "simply opening its books to inspection."<sup>24</sup> Rather, the utility bears the burden of demonstrating the prudence and reasonableness of "each dollar" of its expenditures.<sup>25</sup>

To ensure that SWEPCO satisfies its burden, the Commission's December 17, 2020 Preliminary Order set out the issues that "*must* be addressed" in this proceeding, including Issues 15 and 44, which explicitly require the ALJs to determine the amount of capital costs invested or

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<sup>22</sup> Even if Order No. 7 could be characterized as a mere evidentiary ruling (which it is not), the Commission may still reverse it under Texas Administrative Code § 22.123. In similar circumstances, the Commission recently overruled a discovery order under Section 22.123, and allowed parties to develop factual evidence and argument that could be relevant to the ultimate issues in the case, as identified by the Commission. Order on Appeal, PUC Docket 46734 (Interchange Doc. 123, Aug. 21, 2017), *Petition of Murphy Oil Corporation for Declaratory Order Regarding Service to the Murphy Oil Eagle Ford Leasehold Area* (reversing ALJ order and granting motion to compel responses to "requests for information are reasonably calculated to lead to the discovery of admissible evidence" relevant to the Commission's determination of the ultimate issues in the case). The Commission should do the same here.

<sup>23</sup> PURA § 36.006.

<sup>24</sup> *Entergy Gulf States, Inc. v. Pub. Util. Comm'n of Tex.*, 112 S.W.3d 208, 214 (Tex. App.-Austin, 2003).

<sup>25</sup> *Id.*; see also *Coalition of Cities for Affordable Util. Rates v. Pub. Util. Comm'n of Tex.*, 798 S.W.2d 560, 563 (Tex. 1990), *receded from on other grounds by Barr v. Resolution Trust Corp. ex rel. Sunbelt Federal Sav.*, 837 S.W.2d 627, 629 (Tex. 1992).

incurred, if any, and whether “*any* of SWEPCO’s expenditures are unreasonable” or not in the public interest.<sup>26</sup>

Importantly, in any hearing before SOAH, the APA imposes additional requirements designed to ensure the fundamental due process rights of the parties.<sup>27</sup> Specifically, Section 2001.051 of the Texas Government Code provides, “[i]n a contested case, each party is entitled to an opportunity . . . to respond and to present evidence and argument on each issue involved in the case.” Section 2001.142 further requires that all administrative decisions include findings of fact “based only on the evidence and on matters that are officially noticed.”

Here, Order No. 7 violates those due process principles in two key respects, and prejudices Sierra Club’s right “to respond and to present evidence and argument on each issue involved in the case.”<sup>28</sup> First, the ALJs concluded, without a hearing and without citing any admissible evidence, that SWEPCO is “not seeking to recover” any costs related to the retrofit of Flint Creek.<sup>29</sup> In fact, admissible evidence in the record suggests the opposite is true. As reflected in the Company’s own rate schedules and discovery responses, SWEPCO admits that it has

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<sup>26</sup> Preliminary Order, Issues 15, 24, 44 (emphasis added). As noted, SWEPCO and Commission Staff included the same ultimate issues in their submittals. *See also* SWEPCO List of Issues to Be Addressed (Interchange Doc. 39, Nov. 12, 2020) (Issue 13, 19.D, 20, 33) Commission Staff Issue List (Interchange Doc. 41, Nov. 12, 2020) (Issue 13, 19.D, 20, 33).

<sup>27</sup> *West Texas Utilities Co. v. Office of Public Utility Counsel*, 896 S.W.2d 261, 273 (Tex.App. Austin 1995).

<sup>28</sup> Tex. Gov’t Code § 2001.051. (“In a contested case, each party is entitled to an opportunity . . . to present evidence and argument on each issue involved in the case”).

<sup>29</sup> Order No. 7 at 5.

already invested significant capital in the Flint Creek retrofit, at least some of which the Company “*requested for the first time in rates and the test year period.*”<sup>30</sup>

Despite the Company’s own representations regarding the costs included in this case, the ALJs concluded that the \$401,396 referenced in SWEPCO’s discovery response, which Mr. McMahon attested was “requested for the first time in rates and the test year period,” was instead “construction work in progress that has not been moved into rate base.”<sup>31</sup> But that conclusion is not based on any admissible evidence in the record; and it essentially resolves one of the ultimate issues in this case without a hearing.<sup>32</sup> SWEPCO attorneys’ arguments<sup>33</sup> about the purportedly correct interpretation of Schedules H-5.2b and H-5.3b or the Company’s own discovery responses are not evidence, and they are certainly not a proper basis on which to resolve an ultimate issue in this case.<sup>34</sup> Nor did the ALJs address the issue of whether Flint Creek ELG/CCR costs that were incurred *before* the test year will be included in customers’ rates.<sup>35</sup> At a minimum, the discrepancy between SWEPCO’s discovery responses and its counsel’s arguments confirms the existence of disputed issues of fact warranting a hearing on the issues raised in Ms. Glick’s testimony. Instead, the ALJs impermissibly resolved those disputed issues

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<sup>30</sup> Ex. A (emphasis added). Supplemental Attachments 1 and 2 to CARD 1-16 indicate that, of the \$26.8 million Flint Creek retrofit, the Company has already expended \$1,282,613 on the project, \$401,395.97 of which was expended during the Test Year.

<sup>31</sup> Order No. 7 at 5.

<sup>32</sup> Tex. Gov’t Code § 2001.141(c) (administrative decisions must be “based only on the evidence and on matters that are officially noticed.”).

<sup>33</sup> SWEPCO Reply in Supp. of Mot. to Strike at 2-3.

<sup>34</sup> Tex. Gov’t Code § 2001.141(c); *In re A.L.R.*, 2002 WL 31833703, at \*3 (Tex.App.-Austin 2002) (“statements of counsel are not evidence”) (quoting *Berrios-Torres v. State*, 802 S.W.2d 91, 96 (Tex.App.-Austin 1990, no pet.)).

<sup>35</sup> As noted, the Company has expended \$1,282,613 on the project, \$401,395.97 of which was expended during the Test Year; the remainder was invested before the test year. Schedule H-5.3b.

of fact without allowing the parties to submit evidence or argument demonstrating that there are, in fact, Flint Creek retrofit costs at issue. And in doing so, the ALJs' Order prejudices Sierra Club's right to submit evidence related to the ultimate issues in this case—specifically, Commission Issues 15 and 44 regarding the prudence of “any” capital expended or incurred.

Second, Order No. 7 further concludes, also without a hearing or any evidence admitted in the record, that SWEPCO “did not make a decision in the test year to retrofit Flint Creek,” and that the timeline or prudence of that retrofit decision are not at issue.<sup>36</sup> But the ALJs again fail to cite any admissible evidence for that finding of fact.<sup>37</sup> Instead, they again appear to rely on SWEPCO's attorneys' statements that the Company's decision to retrofit Flint Creek was made and communicated to EPA in November 2020, after the test year.<sup>38</sup> But again, SWEPCO's attorneys' argument is not evidence; and the Company's press release is not part of the administrative record. And even if SWEPCO communicated its final retrofit decision to EPA in November 2020, that does not mean the Company did not decide to retrofit Flint Creek prior to that date. Indeed, the Company invested \$1.2 million in the retrofit project during and before the test year, suggesting that the Company made the decision to retrofit Flint Creek well before November 2020 (or, alternatively, began a construction project with no prudent basis). In any event, the ALJs' finding that SWEPCO did not make a decision to retrofit Flint Creek “in the test year” was premature and unsupported by the record.

Given the disputed issues of fact concerning the timing, amount, and prudence of SWEPCO's Flint Creek retrofit costs in this case, Sierra Club should be allowed to adduce

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<sup>36</sup> Order No. 7 at 5.

<sup>37</sup> Order No. 7 at 3-4.

<sup>38</sup> SWEPCO Reply in Supp. of Mot. to Strike at 4 (citing an AEP press release).

evidence supporting its claims that those retrofit costs are, in fact, at issue. At a minimum, the Commission should conditionally allow Sierra Club's testimony into evidence such that Sierra Club can establish its relevance through further discovery and cross-examination on the precise retrofit costs SWEPCO seeks to recover in this matter.<sup>39</sup>

**B. The ALJs' Order Wrongly Limits Review of Test Year Spending For The Flint Creek Power Plant.**

In addition to improperly resolving disputed, ultimate issues of fact without any evidentiary basis, the ALJs' ruling improperly limits the scope of review for the Company's requested test year costs at Flint Creek, which are indisputably at issue. The Company has the burden of proof to show that every dollar of the \$9.8 million in O&M and \$3.4 million in test-year capital and O&M expenses are justified.<sup>40</sup> Assuming, without conceding, that not one dollar of coal ash or wastewater compliance costs are included in these test year spending figures, the ALJs' Order should be reversed because it improperly precludes Sierra Club from challenging those ongoing capital and maintenance costs with evidence demonstrating the Company's evaluation of replacement resource is flawed, and that the Company is imprudently incurring costs to maintain and operate an uneconomic resource.

Sierra Club's evaluation of SWEPCO's coal ash and wastewater retrofit analysis is relevant to the prudence of the non-retrofit costs SWEPCO seeks to recover in this case. A prudent utility would only include the O&M and capital maintenance costs in customers' rates that are necessary to maintain a generating unit in operation through the end of the expected

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<sup>39</sup> Under the doctrine of conditional relevance, "[w]hen the relevance of evidence depends on whether a fact exists, proof must be introduced sufficient to support a finding that the fact does exist. The court may admit the proposed evidence on the condition that the proof be introduced later." Tex. R. Evid. 104(b).

<sup>40</sup> Direct Testimony of Devi Glick at 11, Table 1.



useful life of the unit. If Sierra Club were to show that a prudent utility would choose to retire Flint Creek sooner than currently scheduled—which the Sierra Club Direct Testimony tends to show—then the prudence of all of the test year O&M and capital maintenance expenses is in question because those expenditures should be reduced as the plant nears its retirement date. The costs to upkeep and repair a generating unit become less pertinent as the unit approaches its end of operations. More specifically, a capital maintenance project that is not needed to keep the unit operating through a reduced useful life is not a prudent investment and should be avoided.

The ALJs' Order rejects this theory of prudent utility planning on the grounds that Sierra Club “offered no legal support” for it and further that “Sierra Club could attempt to develop a record that would justify disallowance of some or all of capital and O&M actually.”<sup>41</sup> Neither point is valid at this stage of the proceeding. First, Sierra Club’s ability to develop a record to challenge the ongoing Flint Creek spending is entirely precluded by the Order because the ALJs have incorrectly held as a final matter that the SWEPCO’s long-term planning and selection of a retirement date is outside the scope of the case, effectively rendering a final decision on several disputed issues in the case as relates to this power plant.<sup>42</sup>

Second, Sierra Club has cited to general Texas law that empowers the Commission to set just and reasonable retail rates; and a rate “cannot be deemed just and reasonable unless the utility was prudent in incurring the operating expenses it seeks to pass through to consumers.”<sup>43</sup> And while Sierra Club is not aware of any Texas PUC authority for the principle that a utility

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<sup>41</sup> Order No. 7 at 5.

<sup>42</sup> Preliminary Order, Issue 24; SWEPCO List of Issues to Be Addressed (Interchange Doc. 39, Nov. 12, 2020) (Issue 13, 19.D, 20, 33) Commission Staff Issue List (Interchange Doc. 41, Nov. 12, 2020) (Issue 13, 19.D, 20, 33).

<sup>43</sup> *Id.*

should reduce capital maintenance and O&M as a plant nears retirement, nothing precludes the Commission from adopting such policy based on a fully developed record, as at least one other state Commission has done. The Michigan Commission rejected ongoing spending at the DTE's River Rouge power plant on a similar theory:

Presuming the costs were, in fact, necessary to ensure that the River Rouge plant remained safe to operate, this overlooks whether it was reasonable and prudent to keep the River Rouge plant operating *at all*. ***The PSC found that it had been imprudent for DTE not to retire and replace the River Rouge plant earlier, instead of expending resources keeping it operational.*** Thus, it would follow that investing significant resources into upgrading something that should have been retired would also be unreasonable and imprudent. Because the PSC had a sufficient evidentiary basis for concluding that such continued operation was not reasonable, DTE fails to show that the disallowance of the recovery of capitalized maintenance expenses for it was unreasonable or arbitrary.<sup>44</sup>

Order No. 7 effectively hamstring the Commission from adopting a similar policy to protect customers from capital maintenance projects that may not be needed to maintain a unit through a reduced expected useful life. In sum, Order No. 7 should be reversed because Ms. Glick's analysis of the going forward economics of Flint Creek, and her criticisms of SWEPCO's ELG/CRR unit disposition study, are relevant to the non-ELG/CCR costs that SWEPCO has proposed for the plant in the test year. Sierra Club should be permitted to present its case that the Company must defend the prudence of its plan to operate the unit through the current proposed retirement date, which in SWEPCO's filing is projected to be 2037.

### **III. ALJS' ORDER IMPROPERLY RESTRICTS THE POWER OF THE COMMISSION TO REGULATE AND SUPERVISE THE BUSINESS OF A PUBLIC UTILITY.**

Order No. 7 should be reversed for another reason: the ALJs' Order strips the Commission of its authority to protect customers from SWEPCO's decision to effectively lock

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<sup>44</sup> *In re DTE Elec. Co.*, No. 349924, 2021 WL 743782, at \*4 (Mich. Ct. App. Feb. 25, 2021) (emphasis added).

its customers into \$26.8 million in coal ash and wastewater retrofits at Flint Creek. Under PURA §14.001 the “commission has the general power to regulate and supervise the business of each public utility within its jurisdiction and to do anything specifically designated or implied by this title that is necessary and convenient to the exercise of that power and jurisdiction.” Indeed, the legislature granted the Commission “broad regulatory power and attendant powers” in regulating public utilities,<sup>45</sup> including the power to protect retail customers and the “public interest inherent in the rates and services of public utilities.”<sup>46</sup> Thus, the Commission plainly has authority to evaluate whether SWEPCO’s decision to invest \$26.8 million in potentially unnecessary retrofit costs is reasonable and in the public interest.

Here, SWEPCO does not dispute that it has decided to retrofit Flint Creek, already incurred substantial capital expenses, and will complete the project by 2023, thereby committing its customers to tens of millions in retrofit costs. Nor does the Company dispute that a substantial portion of those retrofit costs could be avoided by retiring or converting the plant to gas before EPA’s 2028 compliance deadline. Sierra Club’s testimony simply evaluates the Company’s *own* justification for the Flint Creek retrofit decision, which the Company provided to the parties *in this case*.<sup>47</sup> Moreover, SWEPCO has now filed rebuttal testimony directly responding to Sierra Club’s evidence.

The prudence of SWEPCO’s retrofit decision is now before the Commission, and there is simply no reason to defer the issue to some later date. In fact, by waiting until the Flint Creek

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<sup>45</sup> *Reliant Energy, Inc. v. Pub. Util. Comm’n of Texas*, 153 S.W.3d 174, 189, 194 (Tex. App. 2004).

<sup>46</sup> PURA § 11.002(a); *see also Reliant Energy*, 153 S.W.3d at 205.

<sup>47</sup> As noted, during 2020, SWEPCO conducted a Unit Disposition Analysis purporting to demonstrate that retrofitting (rather than retiring) Flint Creek provides a net benefit to customers.

retrofit is completed, there is a higher risk that customers will be saddled with potentially imprudent costs that could still be avoided if the Company changes course now.<sup>48</sup> Because the Company's justification for the retrofit and Sierra Club's testimony challenging that decision are already before the Commission, it would be more efficient to resolve the issue now, rather than after the costs are sunk. This is especially true in light of SWEPCO's recent history of charging approximately \$700 million to customers to install pollution controls on five coal-burning power plants—four of which will retire early or convert to burning gas—leaving customers with the burden of paying for those retrofits that will be stranded before the end of their useful life.

Under similar circumstances, and to protect customers from potentially significant unnecessary costs, the Commission has evaluated the prudence of estimated and foreseeable costs related to the continuation of an ongoing project, even though those costs were not yet “in service.”<sup>49</sup> The Commission should do the same here and decide the prudence of the overall Flint Creek retrofit project, even though some of the costs are yet to be incurred.

#### **IV. CONCLUSION**

For the foregoing reasons, Sierra Club respectfully asks that the ALJs reconsider Order No. 7. In the alternative, Sierra Club respectfully asks that the Commission reverse Order No. 7 and allow the development of an adequate record to determine the prudence of ongoing spending at SWEPCO's Flint Creek power plant.

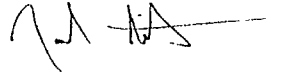
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<sup>48</sup> *Pub. Util. Comm'n of Texas v. Texas Indus. Energy Consumers*, No. 18-1061, 2021 WL 1148227, at \*9 (Tex. Mar. 26, 2021).

<sup>49</sup> See e.g., *Texas Industrial Energy Consumers v. Public Utilities Commission of Texas*, 608 S.W.3d 817, 824 (Tex. App. 2018), *rev'd and remanded*, No. 18-1061, 2021 WL 1148227 (Tex. Mar. 26, 2021).

Dated: May 7, 2021

Respectfully submitted,



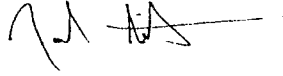
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### **CERTIFICATE OF SERVICE**

I, Joshua Smith, certify that a copy of the foregoing Sierra Club submission was served upon all parties of record in this proceeding on May 7, 2021, by First-class U.S. mail, hand delivery, and/or e-mail, as permitted by the presiding officer.

A handwritten signature in black ink, appearing to read 'J. Smith', is written above a horizontal line.

Joshua Smith  
Sierra Club Environmental Law Program

**SOAH DOCKET NO. 473-21-0538  
PUC DOCKET NO. 51415**

<b>APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES</b>	§ § § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**SOUTHWESTERN ELECTRIC POWER COMPANY’S SUPPLEMENTAL RESPONSE TO  
CITIES ADVOCATING REASONABLE DEREGULATION’S  
FIRST REQUEST FOR INFORMATION**

**FEBRUARY 19, 2021**

**TABLE OF CONTENTS**

<b><u>SECTION</u></b>	<b><u>FILE NAME</u></b>	<b><u>PAGE</u></b>
Response No. CARD 1-16	51415 CARD01-16S Pkg.pdf.....	2
Supplemental Attachment 1 to No. CARD 1-16	51415 CARD01-16S Pkg.pdf.....	3
Supplemental Attachment 2 to No. CARD 1-16	51415 CARD01-16S Pkg.pdf.....	4

**Files provided electronically on the PUC Interchange**

 CARD 1-16 Supplemental Attachments 1 and 2.xlsx

Sierra Club Ex. A to  
Motion for  
Reconsideration and  
Appeal

**SOAH DOCKET NO. 473-21-0538  
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE  
TO CITIES ADVOCATING REASONABLE DEREGULATION'S  
FIRST SET OF REQUESTS FOR INFORMATION**

**Question No. CARD 1-16:**

Provide annual capital expenditures at each SWEPCO power plant for each of the last four calendar years, the test year, and as requested in rates for the first time in this case.

**Response No. CARD 1-16:**

See Schedule H 5-3.b, for the information requested.

**Supplemental Response CARD 1-16:**

For Schedule H-5.3b expenditures broken down by those requested for the first time in rates and the test year period, please see CARD 1-16 Supplemental Attachments 1 and 2.xlsx.

Prepared By: Tara D. Beske

Title: Regulatory Consultant Staff

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO



SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

			July - December			January - March	
Location		Project Description	2016	2017	2018	2019	2020
<b>1320 Central Maint Facility SWEPCO</b>	WSX114593	Tooling Contingency New Tools O	243,486	270,889	274,778	276,112	63,529
<b>1320 Central Maint Facility SWEPCO Total</b>			<b>243,486</b>	<b>270,889</b>	<b>274,778</b>	<b>276,112</b>	<b>63,529</b>
<b>168 SWEPCO Generation</b>	000005264	SEPCo-G Capital Software Dev	4,374,562	6,837,479	9,269,491	6,036,291	1,502,484
	000017845	Alliance RCM Cap Blkt	6,545	11,842	15,082	14,618	500
	000021554	SWEPCO DHLC/Pirkey Land Acq	95,384	1,609,410	719,070	474,476	94,005
	000024115	SWEPCO-G Gen Plt Cap Blanket	147,397	(15,382)			
	000024659	SWEPCO-G General Plt Cap Blkt		67,325	(246)		
	000025252	2018 Gen Plt Cap Blkt - SEP-G			95,307	413,320	18,305
	FHSECUSEP	FH Physical Security SWEPCo		2,449	8,261		
	IT1681421	Maximo Imp - SEP - G	828,365	1,868,647	2,907,968	3,253,361	46,607
	IT168BILL	Corp Prgrm Billing - SWEPCO Ge		4,861,117	1,039,960	2,715,831	146,177
	REOSWE002	Predictive Maintenance Equip	49,854				
	REOSWE003	Mobile Test Equipment-SWEGEN		15,747	40,176	(36)	
	REOSWE005	SCANNER SWEPCO REO	12,800	135			
	REOSWE006	Motion Amplification Software		36,524	7		
	REOSWE007	A/C System Replacement - REO			19,579	(357)	
<b>168 SWEPCO Generation Total</b>			<b>5,514,905</b>	<b>15,295,293</b>	<b>14,114,655</b>	<b>12,907,504</b>	<b>1,808,077</b>
<b>Arsenal Hill Plant</b>	000012163	J.L.Stall @ Arsenal Hill Const	3,517	4,494	9,224	4,848	110
	ARS5BATTY	STATION BATTERY #5				50,481	
	ARS5BDHDR	Blow Down Drain Headers	58,461	16			
	ARS5CONDS	Arsenal Hill #5 Condenser Tub			686,531	27,652	
	ARS5FWVLV	Feed Water Valve	51,699	6,232			
	ARS5IGNSY	Replace U5 Boiler Ignition Sys			148,470	16,879	
	ARS5MSHGR	Replace U5 Steam Line Hanger			126,203	39,463	
	ARS5MVALV	PROVIDE PLATFORMS FOR MISC ARE			25,533	2,238	2,949
	ARS5PACMP	AIR COMPRESSOR REPLACEMENT	50,934	818			
	ARS5STMAJ	STEAM TURBINE MAJOR - 5	254,583	217			
	ARS5WATER	ARSENAL HILL CITY WATER LINE		69,510			
	ARS6ABAND	BELLY BAND REPLACEMENT		114,410	5,788		
	ARS6ABELV	Replace elevator control sys				264,177	
	ARS6ABT3K	Unit 6 Siemens HMI				201,149	7,685
	ARS6ACTEJ	ARS 6A Exhaust Expansion Joint		60,377	5,926		
	ARS6ACTMD	ARS 6A CT PROD MODIFICATIONS			24,287		

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December				January - March	
		2016	2017	2018	2019	2020	
	ARS6ACWPR CIRC WATER PUMP REPLACE			430,788	4,405		
	ARS6AEVCM ARS 6A EVAP COOLER MEDIA			74,774			
	ARS6AHREJ ARS 6A HRSG EXP JOINT		204,984	66,158	72,749		
	ARS6ASCRR Stall U6A SCR Catalyst Replace				776,737	(10,629)	
	ARS6B555A 6B Main Steam Non Return Valve				93,915	(77,761)	
	ARS6BBAND BELLY BAND REPLACEMENT			0			
	ARS6BCTEJ ARS 6B Exhaust Expansion Joint			91,011			
	ARS6BCTMD ARS 6B CT PROD MODIFICATIONS			19,041			
	ARS6BCWPI Stall Circ Water Pump B	248					
	ARS6BCWPR CIRC WATR PUMP REPLACE Unit 6B			370,925	99,823		
	ARS6BEVCM ARS 6B EVAP COOLER MEDIA		93,962	24			
	ARS6BHREJ ARS 6B HRSG EXP JOINT		71,618	171,544	75,547		
	ARS6BSCRR Stall U6B SCR Catalyst Replace			1,374	772,693	(12,020)	
	ARS6CTOUT CT INLET AIR FILTERS	1,568	77,919	335,624	3,444		
	ARS6DEMMB ARS STALL DEMIN MIXED BED				28,046		
	ARS6GSUSP STALL SPARE GSU / 6S & 6 AB				980,845	22,889	
	ARS6HOIST ARS STALL UNIT MONORAILS				16,045		
	ARS6HVACR STALL AIR CONDITIONING UNIT			92,330	43,669		
	ARS6MVALV PROVIDE PLATFORMS FOR MISC ARE			37,388			
	ARS6OUTCP Stall Outage Capital	422,580	124,360	286,267	152,298	27,836	
	ARS6ROMEM Unit 6 RO Membranes		4,731	52,793			
	ARS6STMAJ STEAM TURBINE MAJOR - 6				2,267,397	140,895	
	ARS6TOOLC ARS6 TOOLS OVER 1K	62,190	37,253	74,399	43,186	1,921	
	ARSBAYOU1 Stall-Bayou Bank Stabilization			83,383	1,397,545		
	ARSCP6A17 STALL 6A LTSA CAPITAL 2017		12,105,956	9,173			
	ARSCP6B18 STALL 6B LTSA CAPITAL 2018			12,761,176			
	ARSOUTPPB ARS OUTAGE		3,834	129,199	41,112		
	ARSREOICE REO Ice Machine				4,802	469	
	ARSSRISSU ARS Capital Storeroom Issues	1,563	33,682	23,756	17,312	2,164	
	ARSU5ANUN ANNUNCIATOR REPLACEMENT	200,451	9,636				
	ARSU6CBNT Stall Conf.RM/Kitchen Cabinets	17,480	19,658				
	ARSU6EDGN Stall Emergency Diesel Gen	274,036	92,635	4,097			
	FGCEMS168 FHG CEMS DAHS Upgrade SWEPCO	(53)	56,504				

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December				January - March	
		2016	2017	2018	2019	2020	
	NRXSWPCO SWEPCO Plant NRX System Deploy	164,860	228,233	23,285			
	REOSWE008 HVAC Replacement REO				65,315		
<b>Arsenal Hill Plant Total</b>		<b>1,564,116</b>	<b>13,421,039</b>	<b>16,170,469</b>	<b>7,563,772</b>		<b>106,507</b>
<b>Dolet Hills Plant</b>	DLHCI0023 DLH Environmental Controls	(496,061)	96,886				
	DLHCI0033 Construct New Landfill Cell	55,985	78,905	73,337	61,286		19,790
	DLHCI0034 DLH Switchgear Replc	338,170	551,251	(6,315)			
	DLHCI0042 DH Rpl Boiler Duct, Insulation		386,581	(36,879)	23,192		8,224
	DLHCI0043 DHPS-Upgrade Air Heaters		1,107,967	60,596	2,585		
	DLHCI0044 Rpl Boiler Furnace Lwr Tubing		827,977	(76,699)	(170)		
	WSX111023 Dolet Hills-Ppb Other Producti	1,581,893	5,663,765	6,585,063	2,049,892		1,195,526
<b>Dolet Hills Plant Total</b>		<b>1,479,986</b>	<b>8,713,332</b>	<b>6,599,104</b>	<b>2,136,785</b>		<b>1,223,539</b>
<b>Flint Creek Plant</b>	000013017 FLC Expansion Joint Replace	(14,598)	78,237	(1,038)	1,800		
	000013154 FLC Replace Conveyor Belts	(5,523)		52,690	103,379		
	000013169 FLC Small Tools Coal Yard		6,013	6,504	7,320		3,023
	000013666 FLC Instrumentation Upgrades	10,705	18,016	15,875	66,040		3,370
	000013705 FLC Small Tools Misc	70,318	29,982	91,409	153,625		25,724
	000013708 FLC Install New Platform	239,369	(116,738)		36,032		9,334
	000013728 FLC Coal Yard Cap Projects			34,840	17		
	000014436 FLC Heating Cooling System	0	769	625			
	000015651 FLC Sump Pit A&C Tunnel				16,960		
	000016493 FLC B Pulverizer Gearbox	51					
	000020379 FLC U1 DBA Conver (CCR/ELG)	578,487	168,871	124,839	149,413		261,002
	000021701 FC U1 NOx Mods	317,713	4,985,815	3,217,080	(10,504)		
	FC001FGD0 FC U1 DFGD w/ FF	2,360,516	315,912	(4,959)			
	FC001LFEX Flint Creek LF Lateral Exp	48,291	18,221	1,625	1,462		1,483
	FC001LNDF Flint Creek FGD LandFill	(2,154,576)	1,458,514	206			
	FCLEACHAT FC Landfill Leachate Treatment	3,375,340	(1,490,167)				
	FLC090004 Replace Turbine Blade Rows		144,713	653,190			
	FLCFGDFAN ID Fan Labor				131,452		
	FLCSTATOR FLC Spare Stator Bars				1,282,582		32,880
	FLCTBCTRL FLC Turbine Controls Upgrade	(131,767)	53,036				
	FLCU10025 FLC Dumper PLC Upgrade		85,784	227,959	42,499		
	FLCU10057 FLC Hydr Piping Dust Suppres	4,737					



SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December			January - March		
		2016	2017	2018	2019	2020	
FLCU10067	FLC TDBFP Element Install	(23,749)					
FLCU10129	FLC CSP Pumps	28,578	335				
FLCU10155	FLC U1B 4-kV Switchgear Repl	268,397	560,160	739,373			
FLCU10156	FLC U1C 4-kV Switchgear Repl	135,262	507,679				(150)
FLCU10157	FLC 4KV CH1A1B Switchgear Rpl		372,185	401,418	172		
FLCU10200	Storm Water Run Off Pond	374,850	(178,837)				
FLCU10245	Pump Replacement			27,673	49,592		5,786
FLCU10246	New HVAC for Maint Bldg	42,308	(21,248)				
FLCU10247	FLCU1 Generator Stator Rewind						241,621
FLCU10261	Misc Valve Replacement		3,327				1,182
FLCU10262	Baghouse Filters Ash Silo Bunk	16,631					
FLCU10284	Pulverizer Inerting System	(17,050)	(9)				
FLCU10294	Replace Bottom Ash Slide Gate	(38)					
FLCU10321	Mill Auto Fogging and Swirl	(14,603)					
FLCU10330	Replace Misc BOP Valves			9,245	7,783		95
FLCU10340	Repl IK Sootblower	(3,199)					
FLCU10353	CCR Install Monitoring Wells	23,060	(18,463)				
FLCU10357	CO2 Tank Replacement	3,754					
FLCU10363	Replace Stack Lighting	53					
FLCU10365	Replace Air Dryer Compressor			4,003			
FLCU10366	Replace IKWL Piping	22,539					
FLCU10369	Install IKWL Sootblower Pump	(2,023)					
FLCU10371	Install Construction Elevator	299,865	(1,002)				
FLCU10378	Replace FD Inlet Dampers	(3,776)					
FLCU10379	Install Bag House BD Damper	(206)					
FLCU10382	Replace Pulv Roll Wheels	498					
FLCU10383	Rebuild E Pulverizer	(2,133)					
FLCU10384	Replace B GSU Pump and Bearing	476					
FLCU10385	Purchase 8 Smart Boards	79,359	(35,216)				
FLCU10386	Purchase Heat Trace Panels	2,368					
FLCU10388	Inst Iso Valve On Attemp Spray	(3,050)					
FLCU10389	Replace Mixed Bed Resins 2016	(166)					
FLCU10399	Purchase Plant Radios	114					

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December		2018	2019	January - March	
		2016	2017			2020	
	FLCU10410 Service Bldg Furniture Purch	60,749	(29,846)				
	FLCU10414 1A 4160v/480v Aux Transformer	41,242					
	FLCU10415 ABB DCS Server for Disaster Re	27,625	(2,210)				
	FLCU10417 Yokogawa Probe and Analyzers	379			7,100		
	FLCU10418 Purchase 33 Gal Foam Fire Ext	(1,645)					
	FLCU10420 Replace Capacitor Bank Swgear				201,402	176,543	
	FLCU10421 Replace HVAC at Coal Yard	6,885					
	FLCU10424 NERC Compliance DDR Req.						239
	FLCU10425 Replace "A" Ash Silo Aeration	3,994					
	FLCU10426 Replace "B" LP Htr 36" iso val	20,248	4				
	FLCU10427 Install a 510' Road to Pond	88,458	817				
	FLCU10428 Structure for Des Smoking Area	4,485					
	FLCU10433 Retainage Fee for A Switchgear	3,840					
	FLCU10435 Replace Turbine Crane Controls	184,922	(77,271)				
	FLCU10441 Purchase Lathe Machine Shop	41,605	(16,120)	(879)			
	FLCU10442 Replace Motor Pump City Lake		2,647		8,623	1,622	
	FLCU10443 Repl A Pulv Roll Wheel Assembl	243,845	(96,359)	(37)			
	FLCU10444 Construct Bldg at Eagle Watch	81,217	(39,940)				
	FLCU10445 NDE COLD REHEAT STEAM LINE INS		149,237				
	FLCU10446 Replace Anion Resins		22,193				
	FLCU10449 Motor Driven Feed Pump Element		186,848	38,709			
	FLCU10450 Replace Screen Wash Pump		20,480				
	FLCU10451 Install Piezometers Landfill		18,206				
	FLCU10452 Repl Pressure Switches Pinmix		4,196				
	FLCU10453 ID Fan Replacement Hub		(378)				
	FLCU10454 Replace Generator Bushings & C		226,301	86,305	9,666		
	FLCU10456 Repl B Fly Ash Fluidizing Blow		4,409				
	FLCU10457 Acoustic Cleaning of VFD		4,429				
	FLCU10458 Repl Tripper & Coal Belt Contr		219,177	180,262	37,941		
	FLCU10460 Gentry Sewer upper House S Mtr		8,729	211			
	FLCU10461 Upgrade Plant Radio System		4,268	(4,932)			
	FLCU10463 Crowder Family Land Purchase		152,691	(68,905)	989	804	
	FLCU10469 Replace C Pulv Rotating Seg		146,604	(1,070)	82,891	1,159	

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December			January - March	
		2016	2017	2018	2019	2020
FLCU10471	Inst Stck Feeder Controls VFD		43,145	41,321		
FLCU10472	PULV REPLACE ROLL WHEEL ASSE		224,432	(96,340)	113,468	16,048
FLCU10473	Purchase new electric UTV		12,148	(5,924)		
FLCU10474	Replace Boiler Gate			5,081		
FLCU10475	Unit Aux Tfmr B Bushing Replac			50,673		
FLCU10476	Replace C PA Duct Exp Jt			58,177		
FLCU10477	Replace Plant Fire Pump			27,625		
FLCU10480	Lime DCS Compressor 7.5 Ton			3,827	61	
FLCU10481	HU Diff Relay Replacement			41,504	67,399	9,631
FLCU10482	Rep 1k Sootblower 54 12 & 4			65,434	15,514	
FLCU10483	Purchase AC VFD for Maint Bldg			6,509	(3,052)	
FLCU10485	Replace NID Recycle Rotary Fee			70,221	30,257	
FLCU10486	Primary BA Pond Oil Boom				2,685	
FLCU10487	Replace "B" Economizer Valve			946		
FLCU10488	Replace IKWL Rotating Pump Asm			8,116		
FLCU10489	MOTOR REWINDS			(81)	8,361	(541)
FLCU10490	REPLACE CLINKER GRINDER MOTOR			2,628		
FLCU10491	Replace Demin Work Stations			19,771	128,078	
FLCU10493	Replace Reheat Attemper Nozzle			13,652	10,017	
FLCU10494	BUNKER DUST EXHAUST FAN MOTOR				2,782	
FLCU10497	Replace ISO Valves NID Cooler				5,369	
FLCU10519	CH 1C Main Feed to Dumper				57,798	
FLCU10520	DISCHARGE CHECK VALVE				1,220	
FLCU10521	Replace Bags in Ash Silo Bagho				11,295	
FLCU10523	Replace 1CH1 Breaker				4,880	
FLCU10528	Replace "B2" Flyash crossover				4,876	
FLCU10529	Replace J- Duct Exhauster				3,524	3,966
FLCU10530	Purchase Motors Over 10H				3,984	8,448
FLCU10531	REPL CONTROLS BUNKER DUST				3,557	2,396
FLCU10534	Pulv Swing Gate Switch and Sol				168,214	27,036
FLCU10535	Pump Replacement					6,236
FLCU10538	C GSU Cooling Pumps and Valves				118,547	3,421
FLCU10540	Repl "A" Lime Transport Blower				7,514	1,896



SOUTHWESTERN ELECTRIC POWER COMPANY

Fossil Capital Expenditures

Requested for the first time in rates

Location	Project Description	July - December				January - March	
		2016	2017	2018	2019	2020	
	FLCU10546 DCS Controls Switch Upgrade				7,679	11	
	FLCU10548 CSP Pumps					31,821	
	FLCU10553 Replace Pinion Gear At Dumper					2,919	
	GENREB168 Generation Rebate Program			(9,729)	456		
<b>Flint Creek Plant Total</b>		<b>6,735,032</b>	<b>8,134,728</b>	<b>6,135,633</b>	<b>3,162,718</b>	<b>879,006</b>	
<b>Knox Lee Plant</b>							
	ARCFLA168 Arc Flash Protectn Swi SWEPCO	237,911	19,041	822	1,134		
	FHNERC168 FHG NERC PPB SWEPCO	56,004	23,169	17,867	3,269		
	IT1681321 Regulated RTU Project - SWEPCO	3,363	498				
	KXL0CM001 Small Tools and Misc Equipment	91,063	93,228	81,064	160,643	(56,589)	
	KXL0CM002 KXL U0 Roof Replacement	12,498					
	KXL0CM003 KXL U0 Lab Expansion	119,170	210,593	5,097	(100)		
	KXL0CM004 KXL U0 Main StoreRoom HVAC	13,349					
	KXL0CM006 KXL U0 Replace Oil Booms	6,604	106,685	8,506	512	52	
	KXL0CM009 KXL U0 Security Camera Upgrade	(4)					
	KXL0CM018 KXL U0 Replace Discharge Wall	2	(1)				
	KXL0CM020 KXL U0 New Storeroom Offices	4,953	3				
	KXL0CM023 KXL Storeroom Driveway	299,225	547				
	KXL0CM025 KXL U0 Admin Offices				687,082	96,612	
	KXL0CM027 KXL Replace CEMS Data Logger		35,977				
	KXL0CM028 KXL U0 Cathodic Protection			488,125	7,446		
	KXL0CU001 KXL U0 Motor Rewind	58,860	25,800	8,044			
	KXL0CV002 KXL U0 SW PIPING		227,853	12,173			
	KXL0CW007 Replace Chlorinator Skid				57,339	59,574	
	KXL0CW008 KXL U0 Reverse Osmosis System		10,875	3,074	96,442	28,947	
	KXL2CB002 KXL U2 Boiler Safety Valves	3,622					
	KXL2CB004 KXL U2 Attenuator Bundle		98,232				
	KXL2CM005 KXL U2 HEP Replace Insulation			65,468			
	KXL3CB002 KXL U3 Boiler Safety Valves	11,456	5,506	5,766			
	KXL3CM002 KXL U3 Expansion Joint Replace	7,987	6				
	KXL3CM005 KXL U3 HEP Replace Insulation			69,401			
	KXL3CV002 KXL U3 SW Piping	11,612	(23,203)	13,030			
	KXL4CB003 KXL U4 BFP Rotor Replacement	148,731	8,070				
	KXL5CB003 KXL U5 Boiler Gas Header Vlvs				265,937	39,818	

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December		2018	2019	January - March 2020
		2016	2017			
	KXL5CB009 KXL U5 Boiler Lighting			174,823	105,079	
	KXL5CB010 KXL U5 Replace Air Compressor				98,479	24,325
	KXL5CD008 KXL U5 Annunciator Controls			327,024	18,660	35
	KXL5CD009 KXL5 AMMONIA INJECTION SYSTEM				17,631	74,933
	KXL5CE003 KXL U5 NERC Relays Replacement			118,315	14,904	164
	KXL5CE007 KXL5 U5 RELAY				4,144	4,811
	KXL5CG002 KXL U5 Emergency Generator Set	82,304	31,216			
	KXL5CG004 Replace Generator Leads U5				165,130	11,795
	KXL5CH001 KXL U5 E FWH Retube	76,908				
	KXL5CH002 KXL U5 Air Heater Seals Rpl				173,767	16,352
	KXL5CH003 KXL U5 B FWH Retube	23,209				
	KXL5CH004 KXL U5 FWH Control System	93,824				
	KXL5CI003 KXL U5 C CWP Upgrade			358,360	22,586	
	KXL5CM004 KXL U5 Expansion Joint Upgrade			140,160	94,255	3,024
	KXL5CM005 KXL U5 Gas Valve Upgrade		(7,879)	(2,863)	(260)	
	KXL5CM007 KXL U5 Fuel Oil Conversion	52	(54)			
	KXL5CM012 KXL U5 Diode Bridge Upgrade		202,996			
	KXL5CM013 KXL U5 Replace B Vacuum Pump	76,553	21,174			
	KXL5CM014 KXL U5 TDL Laser Analyzer				176,301	20,860
	KXL5CM021 KXL 5 USED Oil Storage Tank				2,781	6,097
	KXL5CT001 KXL U5 Turbine Bucket Rep		1,400,376			
	KXL5CT005 KXL U5 TO Cooler Retube		119,108			
	KXL5CT006 KXL U5 Turbine Packing		128,392			
	KXL5CT007 KXL U5 Turbine CX Bellows			423,970		
	KXL5CV003 KXL U5 SW Strainer		107,387	154,055		
	KXL5CV004 KXL U5 SW Piping				100,410	(15,015)
	KXL5CW001 KXL U5 Service Water Pump			22,854	42,775	303
	KXL5CW002 KXL U5 Boiler Silica Analyzer				14,641	243
	KXLU5CFWH KXL U5 C FWH RETUBE	1,052	263,084			
	NRCPSWPCO NERC CIP SWEPCO	10,310	944,669	1,250,100	15,393	
	SWE168RTU SWEPCO Gen RTU Upgrade		40,732	42,461	8,125	
	SWE168VAR SWEPCO Volt/VAR Compliance		79,236	7,662		
	SWEGASMET SWEPCO Gas Meter Upgrades	10,526				



SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December				January - March	
		2016	2017	2018	2019	2020	
<b>Knox Lee Plant Total</b>		<b>1,461,145</b>	<b>4,173,315</b>	<b>3,795,357</b>	<b>2,354,507</b>	<b>316,342</b>	
<b>Lieberman Plant</b>	LBM0CB00M Oil Booms			39,577	1,897		
	LBM0CCOOL Turbine Lube Oil Cooler				289,906	13,941	
	LBM0CCTFL Comp. Turbine Floor Lighting		19,108	33,551	64,734	30,633	
	LBM0CELEV Complete Elevator Replacement		32,011	18,836			
	LBM0CEXJO Boiler Outlet Expansion Joints			176,801	846		
	LBM0CG100 New Hydrogen System	74,303	21,996				
	LBM0CG202 Water Treatment Building					9,127	
	LBM0CGATE Entrance Gate Replacement				12,942		
	LBM0CI101 UO Bleach System	12,884	75,168	46,429	974		
	LBM0CM100 UO Administration Building	13,514	(15,403)				
	LBM0CM101 UO Valve Replacement/Upgrades		1,569	62,656	254,096	66,910	
	LBM0CM102 UO Engine Powered Welding Mach	20					
	LBM0CM104 UO Small Tools & MiscEquipment	3,479	45,449	52,814	14,642	28,211	
	LBM0CM106 UO Purchase New Scissor Lift	20,512	128				
	LBM0CN100 UO CATHODIC PROTECTION			593,371	57,977		
	LBM0CPPBX PPB COMBINED		35,661	20,901	22		
	LBM0CS100 UO Safety Equipment	26,924	284				
	LBM0CSHOP Shop Refurbishment			103,037	531		
	LBM0CSIGN Double Sided Ground Sign		18,979	19,791	294		
	LBM0CT100 UO Oil Purifier	715					
	LBM0CT200 Replacement of Transformer				329,229	755	
	LBM0CT201 Lighting Transformer				23,212	1,440	
	LBM0CTRAN Replacement of Transmitters			24,780	6,635		
	LBM10C008 Lieberman U4 Retube Condenser	8,806	648,048				
	LBM15C001 PPB COMBINED	3,674	1,034				
	LBM15C002 U3 Main Steam Stop Valve	65,726	8,028				
	LBM15C003 O2 ANALYZER	716					
	LBM15C005 Cap Outage Combined	(269)					
	LBM16C001 PPB COMBINED	43,754	29,777	1,506			
	LBM16C002 UO REPLACE WATER TREATMENT SYS	7,421	129				
	LBM2CB100 U2 Main Steam Stop Valve	9,218	4,645				
	LBM2CB101 U2 Air Flow	289	(289)				

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
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		2016	2017	2018	2019	2020
	LBM2CFDFN U2 FD Fan Bearing System			3,239		
	LBM2CK100 U2 Feedwater Replacement	61,640	1,023			
	LBM2CT100 U2 Replace Bearing Oil Pump	9,437	1,308			
	LBM2CT101 U2 Emergency Seal Oil Pump	9,279	1,395			
	LBM2CV100 U2 Service Water Pump	18,301	373			
	LBM3CB102 U3 High Energy Piping Hangers		253,114			
	LBM3CB106 U3 New Natural Gas Press Instr		21,913			
	LBM3CF100 U3 Spray Valve Replacement	57,273	9,699			
	LBM3CF101 U3 RETUBE D FEEDWATER HEATER	172,718	21,701			
	LBM3CH101 U3 Heater Control System	182,618	14,368	9,161	147	
	LBM3CPIRB U3 Pilot Igniter Rebuild			97,137	142,419	
	LBM3CPUMP U3 Boiler Chemical Pump			12,170	10,584	
	LBM3CTVAL U3 Governor Valve Replacement			126,208	604	
	LBM3CV100 U3 B-Service Water Check Valve	2,169				
	LBM4CB106 U4 New Natural Gas Press Instr		13,593			
	LBM4CF100 U4 Spray Valve Replacement	29,851	5,696			
	LBM4CF101 U4 RETUBE D FEEDWATER HEATER		107,423			
	LBM4CFRBL U4 New Fresh Blower		10,409	16,877	590	
	LBM4CG101 U4 Seal Oil Cooler	1,969				
	LBM4CH101 U4 Heater Control System	813	120,607	9,161	147	
	LBM4CHTWL Upgrading Hot Well Controls		22,083	249,237	8,452	
	LBM4CPIRB U4 Pilot Igniter Rebuild			134,650	58,531	
	LBM4CPUMP U4 Boiler Chemical Pump			7,002		
	LBMCALARM Alarm System			268,188	27,673	
	LBMSELREL U3 & U4 SEL relay		17,078	17,861	(179)	
<b>Lieberman Plant Total</b>		<b>837,754</b>	<b>1,548,102</b>	<b>2,144,941</b>	<b>1,306,903</b>	<b>151,018</b>
<b>Lone Star Plant</b>	LNS000611 Capital PPB - Misc Project	43,917	28,835	15,298	(46,630)	816
	LNSC00009 BOILER DUCT EXPANSION JOINTS	48,470	(949)			
	LNSC00017 REPLACE MAIN STEAM SAFETY VLV	20,920	(3,691)			
	LNSC00018 U1 REPLACE CENTRIFUGE	154	91			
	LNSC00019 LNS CATHODIC PROT NAT GAS LINE	(5,473)	462			
	LNSC00021 REPLACE ROOF, OFFICE, CEMS, PRT	45,369	19			
	LNSC00022 U0 REPLACE GASLINE COMPONENTS	7,614	115	1,492	765	

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
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Location	Project Description	July - December 2016	2017	2018	2019	January - March 2020
	LNSC00023 REPLACE GSU LV BUSHINGS		48,846			
	LNSC00025 U1 CEMS DATA CONTROLLER REPL		17,741	374		
<b>Lone Star Plant Total</b>		<b>160,972</b>	<b>91,469</b>	<b>17,165</b>	<b>(45,865)</b>	<b>816</b>
<b>Mattison Plant</b>	000014768 TON Plant Improvements		34,790	77,423	26,656	17,560
	HDMU00002 HDM Small Tools				3,545	
	HDMU00022 Instrumentation Replacements	2	3,874	6,482		
	HDMU00051 Repl. DGP Protective Relays		95,048	(11,869)		
	HDMU00052 Purchase Smart Boards	84	81			
	HDMU00055 Purchase Datamax Printer	1				
	HDMU00056 Purchase Battery Charger	3				
	HDMU00057 Install Roof Over Transformers		15,658	6,542		
	HDMU00058 Portable Vibration Detection		5,864			
	HDMU00074 Construct Maintenance Building			71,618	195,734	30,812
	HDMU00075 Purchase Capital Tools				9,622	4,138
	HDMU00076 GE Stationary Blade Replace				459,900	13,507
	HDMU12002 CEMS Data Equipment		16,915	(3)		
	HDMU20005 Instrumentation Replacements	17	16			
	HDMU30003 Instrumentation Replacements			12,175		
	HDMU34001 CEMS Data Equipment		16,915	151		
	HDMU40004 Instrumentation Replacements		9,612			
	HDMU40012 Set of CT Transition Pieces				563,225	56,086
<b>Mattison Plant Total</b>		<b>106</b>	<b>198,773</b>	<b>162,518</b>	<b>1,258,682</b>	<b>122,102</b>
<b>Pirkey Plant</b>	000026191 PRK CCR/ELG Compliance				1,394,957	419,712
	PRK001BAG PRK ACI Calcium Bromide	(22)				
	PRK10C220 CY CONVEYOR BELTS	142,747	2,665	72,926	133,260	(418)
	PRK10C251 PULV GRINDING TABLES BOWL	349,671	418,461	87,047	76,474	126,907
	PRK10C302 Boiler Duct Exp Joints	94,431	(194)	10,418	91,749	
	PRK10C885 FGD SLUDGE CONVEYOR BELTS	42,455	35,378	20,271		
	PRK11C005 CAP STOREROOM ISSUES	16,233	2,333			
	PRK11C806 ASH BA PIPING	44,752	(0)	16,424	3,414	
	PRK12C704 PRK Controls BMS CC	469,099	4,651,334	3,846,625	6,251,085	277,867
	PRK13C600 Precip Rappers	77,659	106,524	79,741	94,245	1,897
	PRK14C810 ASH ECON ASH			57,261	17,031	



SOUTHWESTERN ELECTRIC POWER COMPANY  
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		2016	2017			2020	
	PRK14M915 BUILDINGS ROOFS SLUDGE BLDG	123,094	47,114				
	PRK15C001 PPB Outage	12					
	PRK15C002 PPB Non Outage	678					
	PRK15C133 AIR HEATERS PAH COLLAR SEALS	26,201	110,437				
	PRK16C001 PPB Outage	127,776	51,272				
	PRK16C002 PPB Non Outage	759,148	(55,177)				
	PRK17C001 Cap Outage 100K		324,671				
	PRK17C002 Cap Non Outage 100K		680,082	(48,797)			
	PRK18C001 CAP OUTAGE < \$100K		244,672	367,677	9,631		
	PRK18C002 CAP NON-OUTAGE <\$100K		607	1,619,765	7,994		
	PRK19C001 CAP OUTAGE < \$100k			44,777	789,553	(7,582)	
	PRK19C002 CAP NON-OUTAGE < \$100K				962,670	20,970	
	PRK19C162 FGD BALL MILL LINER	11,652	(179)				
	PRK20C002 CAP NON-OUTAGE <\$100K				1,124	115,751	
	PRKCAHT52 "B" SAH SHOES AND EXPAN JNT	52,639	243,157				
	PRKCAHT58 ALPHA SECONDARY AIR HEATER BAS	146,317	198,125				
	PRKCAHT61 PAH SUPPORT/GUIDE BEARING				91,089		
	PRKCBLD00 BUILDINGS HVAC		47,383				
	PRKCBLR52 OFA CORROSION	457,654	1,287,124				
	PRKCBLR60 BOILER HEADER INSULATION				45,150		
	PRKCBOPO2 POND WATER MANAGEMENT		242,044	32,652	351		
	PRKCBOPO51 HIGH ENERGY PIPING		219,249				
	PRKCCCR01 STACKOUT PAD RUNOFF	124,236	90				
	PRKCCEM01 CEMMS DATA LOGGER			65,689	(152)		
	PRKCCNT01 RVP CONTROL CARDS					10,674	
	PRKCCNV02 CONVEYOR PULLEY REPLACEMENT				19,690		
	PRKCCYD01 COAL YARD ANALYZER UPGRADE	162,296	2,622				
	PRKCCYD03 A1 OR A2 RING GRANULATOR REBUI				35,585		
	PRKCDEM00 Demin Analyzers	17,440	12,626	38,778	34,752		
	PRKCDEM01 Demin Acid Caustic Pump Piping		168,059	20,581	70		
	PRKCDEM50 Demin Tanks Coatings			126,919	18,027		
	PRKCDEM51 Demin Carbon/Resins	66					
	PRKCDTC53 Duct Exp Joints AH to FGD	96,382	(685)				

SOUTHWESTERN ELECTRIC POWER COMPANY  
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		2016	2017			
	PRKCENV01 PRK CCR WELLS	19,673	(324)			
	PRKCFDR01 STOCK FEEDER BELTS					3,978
	PRKCFGD51 FGD Valves Recycle	4,660	21,185	7,911	30,547	6,175
	PRKCFGD60 FGD CONTROLS UPGRADE	142,196	200,332	1,363,695	4,854,457	127,344
	PRKCFRP50 DUST SUPPRESSION FIRE PROTECTI	315,330	14,117			
	PRKCNGS01 GAS SUPPLY CATHOTIC PROTECTION		315,589	32,421		
	PRKCPYR01 PYRITE PIPING REPLACEMENT		67,416			
	PRKCRLY01 RELAYS FOR DME			46,698	187,261	6,364
	PRKCSFD01 STOCK FEEDER BELTS				9,368	
	PRKCSFY00 FIRE PROTECTION DETECTION	301,453	(39,550)			
	PRKCSLG02 A FILTER CAKE VACUUM DRUM REPL			291,837	178,729	
	PRKCWTR02 POND EVAPORATOR INSTALL				623,695	
	PRKCYD220 CY ELECTRICAL 480V TRANSFORMER		22,265			
	PRKFGD888 FGD PIPING UPGRADES	85,278	12,433			
	PRKPSC120 Fans ID Overhaul			50,537	(4,979)	
	PRKPSC163 FGD Duct Wall Linings Replace		358,771			
	PRKPSC223 R/R 2019				100,115	
	PRKPSC422 Pumps TDBFP Turbine	26,330	342,643			
	PRKXENV01 Pirkey Landfill Area K Cell 1	(2,628)	1,274	54,518	1,143,832	32,925
	PRKXENV02 PRK Landfill 2012 thru 2016	150,103	65,779	(167)		
	PRKXENV03 PRK Landfill Expansion		110,981	3,051,925	39,369	
	PRKXFAN50 ID Fan Blades B			393,430	494,500	
	PRKXGEN51 CI VOLTAGE REGULATOR			193,316	272,996	19,484
	PRKXWTR53 Replace Pirkey U1 F HP Heater	135,414	468,739			
<b>Pirkey Plant Total</b>		<b>4,520,427</b>	<b>11,001,444</b>	<b>11,944,873</b>	<b>18,007,640</b>	<b>1,162,049</b>
<b>Turk Plant</b>	TKARCLSH Turk Arc Flash Safety Systems	532,582	31,142			
	TRK1PJIFF Pulse Jet Fabric Filter Rplce			710,990		
	TRK1SCR4L SCR Catalyst 4th Layer		666,073	1,094,075		
	TRK2LNDFL TRK ACTIVATE 2 LANDFILL		2,122,883	3,206,070	258,838	
	TRKACIPLC TRK ACTIVATED CARBON INJ PLC	7,678	(167)			
	TRKAHSPLC TRK AIR HTR SECTOR PLATE PLC	76				
	TRKAPEXBU TRK MATS REDUNDANT APEX BACKUP				96,543	5,429
	TRKASHFED TRK #1 ROTARY ASH FEEDER	354				

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
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		2016	2017	2018	2019	2020
TRKASHSLR	TRK ASH SLURRY TANK DISCHRG VL	94,458	(65)			
TRKBAGS17	TRK FLT SEP FLY ASH HANDL BAGS		16,558	3,127		
TRKBAYLIT	TRK TURBINE HI BAY LIGHTS					29,707
TRKBLRACO	TRK BLR PENT ACOUSTIC UPGRADE	164	(2)			
TRKBLRHVA	TRK HVAC BOILER SAMPLE ROOM				6,038	
TRKBLTFDR	TRK RCD UNLOAD BELT FEEDER 1		2,759	2,834		
TRKC2BELT	TRK CONVEYOR 2 BELT REPLACEMEN					115,764
TRKC4GRBX	TRK CY CONVEYOR C-4 GEARBOX			18,135		
TRKC5BELT	TRK CONVEYOR 5 BELT REPLACEMEN					89,913
TRKC61BEL	TRK CONV C-61 BELT CHANGE			138,501		
TRKC6PULY	TRK CONV 6 TAIL PULLEY			12,807		
TRKCANNON	TRK SCR AIR CANNONS					30,272
TRKCAPPB	Turk Capital PPB Projects	3,661	7,914	17,312		
TRKCARINJ	TRK ACT CARBON INJECT REPLACE	230	43,565	1,577		
TRKCCRUL	TRK CCR RULE GW WELLS	3,405				
TRKCELL2S	TRK PRELIM LNDFL CELL 2 STUDY	5,980	(8)			
TRKCEMDL1	TRKCEMSDATLNKTODCS	123				
TRKCIRBRK	TRK SPARE CIRCUIT BREAKER REPA		6,965			
TRKCLROFF	TRK CLEARANCE OFFICE NEW ROOM		16,988	66,803		
TRKCOALFD	TRK COAL STOCK FDR VFD DRV 1-6		15,505	9,062		
TRKCOALYD	TRK MISC COAL EQUIP		61,580	2,099	4,015	437
TRKCOGLTK	TRK WWTP COAGULANT STRG TANK				10,882	243
TRKCONDEN	TRK CONDENSATE POLISHER RESIN			293,066	3,521	
TRKCVBELT	TRK COAL CONV BELT REPLACEMENT			1,119	246,137	5,868
TRKCYBVMS	CY Belt Vibr Monitoring Sys			4,629		
TRKCYCRIC	TRK CY RECLAIM TUNNEL CRICKETS				451,618	216,085
TRKCYELEV	TRK COAL YARD ELEVATOR CRUSHER			561,837	215,290	
TRKCYFCOV	TRK CY FUELING STATION COVER	114,318	0			
TRKCYFPAD	TRK CY FILL STATION PAD	85,000	(20,175)			
TRKCYPUMP	TRK COAL YARD PUMPS	10,599	283			
TRKDCSCOM	TRK DCS EMERSON OVATION WRKSTA		1,961			
TRKDRYFLI	TRK DRY FLIGHT CHAIN & FLIGHTS			25,247		
TRKFABFVL	TRK FLY ASH BUTTERFLY VALVES		11,324			



SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
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	TRKFGDRF2 TRK RECYCLE ASH FEEDER 2	13				
	TRKFLAHTR TRK RAS FLUIDIZING AIR HEATER				6,813	
	TRKFURNTR TRK OFFICE FURNITURE				3,639	
	TRKGAITON TRK GAITRONICS SYSTEM		1,040			10,324
	TRKGAR61 TRK GEARBOX CONVEYOR 61	294				
	TRKGENPLF TRK GENERAL PLATFORMS		76,658	96,632	174,890	163
	TRKGENRLY TRK GEN. GE PROTECTION RELAY		60,118			
	TRKGENUPS TRK PLANT UPS UPGRADES			11,942	4,518	
	TRKGRDSAC TRK GUARD SHACK AC UNIT	(14)				
	TRKH20PON TRK MAKEUP H2O POND	1,251,355	37,779			
	TRKHEATTR TRK WT HEAT TRACE INST CONTROL				9,407	
	TRKHPHEAT TRK HIGH PRESS HTR LVL XMTRS	90,629	(3,827)			
	TRKHTR8DV TRK HTR 8 EMER DRAIN VALVE	70,984	(186)			
	TRKHUMMON TRK HUMIDITY MTR OUTLET PJFF	2,108				
	TRKHVACCN TRK HVAC CONTROL SYS FOR ADMIN					45,392
	TRKHYDPUM TRK HYD PUMP 1 - BFPT	4,822				
	TRKHYDROP TRK HYDROJET PUMP BLOWER SYSTM		41,748			
	TRKIDF2SH TRK ID FAN 2 SHAFT REPLACEMENT	289,716				
	TRKIDFAN1 TRK ID FAN #1 REBUILD			459,222		
	TRKIDFNCL TRK #1 ID FAN LUBE OIL COOLER				13,882	
	TRKIRONWK TRK CY IRON WORKER	13,918	2,414			
	TRKLWTUBE TRK LOW WELL STACK TUBE MODS		(5,126)	403		
	TRKMEDIAF TRK MULTI MEDIA FILTERS	277				
	TRKMISFAN TRK MISC FANS		8,388	18,461		
	TRKMMFLTR TRK WW MULTIMEDIA FILTER		5,825			
	TRKMOTORS TRK MISC MOTORS	43,169	3,475	25,703	4,166	32,040
	TRKMOWR19 TRK NEW EXMARK MOWER ZEROTURN				8,762	
	TRKMSCPPB TRK MISC PPB PROJECTS	8,966	8,409	0	297,106	77,857
	TRKMXBRES I/R MIXED BEDS RESIN REPLACE			47,213		
	TRKOGNRL TRK GENERATOR PROTECTION RELAY			39,625		
	TRKOPWMMF TRK OUTAGE DEMIN MMF MEDIA REP			17,918		
	TRKP320UP TRK ALSTOM P320 UPGRADES	8,576				
	TRKPDMEQT TRK PDM EQUIPMENT			851	152	

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
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TRKPLANEX	TRK PLANNING OFFICE EXPANSION	38,353				
TRKPLGRZO	TRK PLVR GRINDING ZONE REPLACE		18,121	(979)	445,805	(246,634)
TRKPLTF09	TRK PLATFORMS AT CONVEYOR #6	103	91			
TRKPLTF10	TRK ATOM HEAD TANK PLATFORMS	25,884				
TRKPLTF11	TRK ECON OUTLET GAS PLATFORMS	242				
TRKPLTF12	TRK PLTFORMS CY LOWERING WELLS	12,362				
TRKPLTF13	TRK LIME & RA PUMP PLATFORMS	18,812	(201)			
TRKPLTF14	TRK AIR HTR PLTF EXTEN, GRATIN		7,352	73		
TRKPLTF15	TRK WEST END TRIPPER FLR PLTF		11,813			
TRKPLTF16	TRK SEAL AIR PLATFORMS		10,796			
TRKPLTF17	TRK COLD REHEAT ISO VLVS PLTF		13,475			
TRKPLTF18	TRK ACCESS PLTF ASH HANDLING		16,274			
TRKPLTF19	TRK PLTF TURBINE CND SR EXP JNT		26,648			
TRKPLTF20	TRK PLTF AT FLY ASH FDZING AIR		6,765			
TRKPLTF21	TRK PLT CRSR FEED DIV GATE 1		2,889			
TRKPLTF23	TRK PLTF & HDRL @ EXCITER BLDG		9,099			
TRKPLTF24	TRK PLT FOR BLR DRS SEC AIR DT		8,464	260		
TRKPLTRAN	TRK PLANT TRANSMITTERS			42,133	101,778	2,023
TRKPLVSAV	TRK PULVERIZER SEAL AIR VALVES	34,308	(133)			
TRKPLVSWI	TRK PULV FDR BELT SWITCH		31,420	10,582		
TRKPONDRO	Coal Yard Runoff Surge Tanks	283,786	187,162			
TRKPORTAC	TRK PORTABLE HVAC FOR PLVR		3,504	122		
TRKPRESBL	TRK PRESSURE BLOWER 1 N 1CP				881	19
TRKPULVER	TRK PULVERIZER WHEEL REPLAC		394,413	40		2,493
TRKPUMPSO	TRK MISC PUMPS			5,416	9,391	8,689
TRKPWRBLK	TRK POWER BLOCK BREAKER REP		7,736			
TRKPWRCLE	TRK PWR CLEAN CONTROLS UPGRADE	101	17,060			
TRKRAILR1	Turk Rail Replacement			1,651,757	26,702	
TRKRAILR2	Turk Rail Replacement				4,107,310	64,159
TRKRAILRE	TRK RAIL REPLACEMENT			4,209		
TRKRATK01	TRK INSTALL VLV RAS MIX TANK 1	4,944				
TRKRATK02	TRK INSTALL VLV RAS MIX TANK 2	2,475				
TRKRCDAC1	TRK CY RCD AC UNIT				10,331	(41)



SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
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		2016	2017			2020	
	TRKRCDDIS TRK RCD SUMP DISCHARGE LINE	50,537	(1)				
	TRKRCPLC TRK ROTARY CAR DUMPER PLC	1					
	TRKRDREPR TRK ROAD REPAIR & CONCRETE WRK		27,069	(9,314)			
	TRKREAGTJ TRK REAGENT EXPAND JOINTS	(7,066)					
	TRKREAGTV TRK REAGENT PREP VALVES	2,947	7				
	TRKREFUND Turk Overhead Refund Co-owners	683,422					
	TRKROMEMB TRK RO MEMBRANE			34,311			
	TRKRPBFAN TRK REAGENT PREP WALL EX FANS	6,193	6,161				
	TRKRSOSHP TRK RSO SHOP BUILDING		61,422	84,963			
	TRKSAFETY TRK SAFETY ENHANCEMENTS						2,725
	TRKSBCONT TRK SOOTBLWR HYDROJET CONTROLS						3,985
	TRKSCAFFO TRK SCAFFOLDING PLANT	5,640					
	TRKSCRHR1 TRK SCR ACOUSTIC CLNR 1 & 2 LY				61,733		
	TRKSIDEWK TRK SIDEWALKS REAG PREP BLDG		11,796				
	TRKSILOIN TRK Silo Roof Replacement		479,055				
	TRKSLKHTR TRK LIME SLAKER 1 HTR RECTFR				7,045		
	TRKSTAPUM TRK STATOR WATER PUMP @ TURBI	32,043	605	1,612	18		
	TRKSTBPLC TRK SOOTBLOWER PWRCN PLC FIRE			20,769	196		
	TRKSTKRLS TRK STACK GUARDRAILS FLRS 1-4		7,313				
	TRKSWSKID TRK SERVICE WATER INHIB SKIDS	49,308	(226)				
	TRKTOOLS0 TRK TOOLS MISC		6,707	163,385	152,313		19,273
	TRKTRBAVR TRK MAIN & BFP TRB AVR CONT UP				304,811		46,197
	TRKTRPC71 TRK TRIPPER CNVYR C-71 GEARBOX			16,993			
	TRKTURBID TRK RVR CAISSON TURBIDITY MTR	11,247					
	TRKUPGRAD TRK MISC UPGRADES			3,977	16,926		112
	TRKVALVES TRK PPB MISC VALVES		25,644	42,735	13,116		24,385
	TRKVFDREV TRK CONST ELEV VARI AC DRIVES				28,612		
	TRKWTBICE TRK WATER TREATMENT ICE MACH	(26)					
	TRKWWPVEN TRK WASTE WTR POND VENT SYSTEM			505,541			
<b>Turk Plant Total</b>		<b>3,899,057</b>	<b>4,620,101</b>	<b>9,465,848</b>	<b>7,103,184</b>		<b>586,878</b>
<b>Welsh Plant</b>	000020364 WSH U0 DBA Conversion	442,970	564,675	111,701	494,396		445,308
	WSHC30092 U3 REPL STATION BATTERIES	3,061					
	WSHCPA011 WSH U0 Positioner Arm Falk Gea		86,067	5,306			

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December		2017	2018	2019	January - March	
		2016					2020	
WSHCU0000	WSH U0 Lab Equipment			78,657				
WSHCU0003	WSH U0 Parts Sox Under 50K	189,560		423,986	127,218	51,897		213
WSHCU0009	WSH U0 Ultra Filter Membranes	1,987				169,761		
WSHCU0014	WSH U0 Demin Replace Resins				207,637			
WSHCU0019	WSH U0 Coal Car Dumper Replace			826,628	3,483,583	643,517		
WSHCU0024	WSH U0 Small Tools	182,002		300,782	156,427	173,307		184,425
WSHCU0025	WSH U0 RO Membrane					79,406		
WSHCU0030	WSH U0 Platforms				52,523	3,048		
WSHCU0042	WSH U0 COAL YARD 4KV FEED JH					363,803		62,823
WSHCU00A1	WSH U0 Conveyor Belt A1			81,780	1,967			
WSHCU00B1	WSH U0 Conveyor Belt B1			64,453	1,690			
WSHCU00C1	WSH U0 Conveyor Belt C1	55,389		772				
WSHCU00D2	WSH U0 Conveyor Belt D2	71,776		537				
WSHCU0102	WSH U0 COAL YARD CONVEYOR BELT				86,231	1,898		
WSHCU0103	WSH U0 COAL YARD MOTORS				9,830	134,724		
WSHCU0104	WSH U0 COAL YARD GEARBOXES				228,040	4,546		
WSHCU0106	WSH U0 CAPITAL INSTRUMENTATION				43,416	4,495		21
WSHCU0107	WSH U0 PUMP REPLACE/OVERHAUL				225,746	124,551		43,099
WSHCU0108	WSH U0 CAPITAL MOTOR REWINDS			42,194	31,293	5,165		
WSHCU0112	WSH U0 COAL HANDLING 4KV REPL	23,959		1,071,469	25,912			
WSHCU0113	WSH U0 CCR RULE GW WELLS	4,116		465,088	268			
WSHCU0114	WSH U0 CONVEYOR CONTROL SYSTEM			69,556	151,996	6,725		
WSHCU0117	WSH U0 TRIPPER CONTROLS					170,486		1,765
WSHCU0120	WSH U0 ASH POND LAND ACQUISTIO					8,335		
WSHCU0CBK	WSH CAP BANK 4KV Switchgr Rpl			383,058	753,253			
WSHCU1003	WSH U1 Parts Sox Under 50K	87,112		90,200	390,161	311,827		132,001
WSHCU1004	WSH U1 Replace Clinker Grinder			6,424	66,014	183,892		
WSHCU1005	WSH U1 Pulv Cmpnt Changeout			338,714	751,557	599,079		5,398
WSHCU1007	WSH U1 CSP Contractor Labor	50		9,016	34,090	96,632		536
WSHCU1023	WSH U1 Control PC Upgrade	52,254		3,896				
WSHCU1028	WSH U1 Capital Motor Rewinds				96,850	35,495		10,117
WSHCU1029	WSH U1 Valve Replacement	58,532		32,806	(5,285)	317,600		26,124
WSHCU1030	WSH U1 Platforms	56,397		22,676	8,416	113,696		15,155

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December				January - March	
		2016	2017	2018	2019	2020	
WSHCU1049	WSH U1 Expansion Joints Boiler		89,890	8,569	30		
WSHCU1053	WSH U1 Pump Rep/Cap Overhaul	71,153	3,498	88,177	369,974		
WSHCU1059	WSH U1 AH Bask Interm Hot End	1,048,284	23,514				
WSHCU1060	WSH U1 Turbine Major Capital	16,615					
WSHCU1103	WSH U1 GSU TRANSFORMER REPLACE		190,428	789,071			
WSHCU1105	WSH U1 GENERATOR SPARE COILS		3,626,265	636,632			
WSHCU1107	WSH U1 CAPITAL INSTRUMENTATION			154,747	4,313		
WSHCU1108	WSH U1 SEL 487E RELAY/COMPUTER						1,958
WSHCU1110	WSH U1 BYPRODUCT DRY UNLOADING		147,925	128,123	26,338		
WSHCU1111	WSH U1 AIRHEATER SOOTBLOWER SY		126,094	282,897			
WSHCU1113	U1 FABRIC FILTER OPACITY MONIT				90,558		35,523
WSHCU3003	WSH U3 Parts Sox Under 50K	332,021	374,876	330,299	49,255		45,118
WSHCU3004	WSH U3 Replace Clinker Grinder		59,107	180,462			
WSHCU3005	WSH U3 Pulv Cmpnt Changeout	569,551	(1,746)	295,699	594,955		3,641
WSHCU3007	WSH U3 CSP Contractor Labor	151,395	31	158,501	30,636		128
WSHCU3020	WSH U3 Rewedge Generator	(117,777)					
WSHCU3023	WSH U3 Control PC Upgrade	31,620	3,790				
WSHCU3028	WSH U3 Capital Motor Rewinds		10,539	7,492	43,770		2,523
WSHCU3029	WSH U3 Valve Replacement	64,038	187,344	19,824	46,823		19,771
WSHCU3030	WSH U3 Platforms	81,662	(11,597)	35,955	39,891		214
WSHCU3049	WSH U3 Expansion Joints Boiler	63,564	244,303	53,552	19,741		20,860
WSHCU3053	WSH U3 Pump Rep/Cap Overhaul	134	12,909	15,837	309,445		9,120
WSHCU3059	WSH U3 AH Bask Interm Hot End	1,087,545	(61,579)				
WSHCU3101	WSH U3 REPL A C 4KV SWITCHGE	1,700,328	(133,063)				
WSHCU3102	WSH U3B 4-kV Switchgear Repl	442,575	1,751,401	45,655			
WSHCU3105	WSH U3 Generator Rewind	(247,494)					
WSHCU3109	WSH U3 SILO BAGS			47,728			
WSHCU3110	WSH U3 CAPITAL INSTRUMENTATION			160,033	13,047		
WSHCU3111	BYPRODUCT DRY UNLOADING SYS		149,531	98,369	16,668		
WSHCU3112	WSH U3 AIRHEATER SOOTBLOWER SY		126,094	397,271			
WSHCU3113	U3 FABRIC FILTER OPACITY MONIT				102,660		60,496
WSHENVENG	WSH U0 ACI / FF / Chimney	4,963,828	1,330,847	(14,176)			
WWSHPPBNB	WSH Capital Non-Budgeted	67,519	633,307	722,120	1,579,374		35,177



SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December			January - March	
		2016	2017	2018	2019	2020
<b>Welsh Plant Total</b>		<b>11,555,723</b>	<b>13,847,139</b>	<b>11,688,677</b>	<b>7,435,761</b>	<b>1,161,513</b>
<b>Wilkes Plant</b>	WLKC00004 Miscellaneous Tools and Equip	273,337	228,813	236,544	306,853	1,214
	WLKC00007 Miscellaneous Tools	169,634	21,833			
	WLKC00068 INSTALL WEIR GATE		34,879	68,827		
	WLKC00104 REPLACE CENTRIFUGE	136				
	WLKC00105 PLATFORMS	104,950	19,466	1,807	16	
	WLKC00106 WLK CATHODIC PROT NAT GAS LINE		298,757	25,690	23,949	
	WLKC00107 GEN SHAFT GROUNDING EQUIPMENT	41,025	6,060	2,194		
	WLKC00108 BLEACH SYSTEM FOR LAKE WATER		134,253	144,697		
	WLKC00109 CEMS PROCESS LOGGER REPL		16,241	(38)		
	WLKC00110 REPLACE LODGE & CABINS ROOFS		101,282	(10,675)		
	WLKC00111 U0 WILKES PI SERVERS INSTALL		38,371	3,254	12,839	
	WLKC00114 REPL TRANSFORMER AT LODGE			2,927	(12)	
	WLKC00115 U0 INTRASITE COMMUNICATION INS			18,488	10,909	
	WLKC00116 REPLACE LODGE FLOOR			23,391	(898)	(584)
	WLKC00117 U0 DEMIN RESIN REPLACEMENT				23,896	394
	WLKC00118 U0 PAVE PLANT ROAD ENTRANCE				80,000	12,323
	WLKC00119 REPLACE ALL CABIN WINDOWS				17,259	1,543
	WLKC01017 U0 REPLACE FIRE PUMP BOWL			45,595		
	WLKC10025 U1 DUCT EXPANSION JOINTS	97,916	40,890	(46)		
	WLKC10026 U1 CWP EXPANSION JOINTS	7,312				
	WLKC10033 U1 FLAME DETECTION		344,476	447		
	WLKC10042 U1 REPL GAS LINE COMPONENTS	36,916		15,750		
	WLKC10043 U1 A MDBFP DISCHARGE VALVE	52,512				
	WLKC10044 U1 RAT TRANSFORMER BUSH REPLAC	92,595	16			
	WLKC10046 U1 COMBUSTIBLE ANALYZER REPLAC	69,814	37,980	131		
	WLKC10047 U1 CEMS DATA CONTROLLER REPL		18,305	(43)		
	WLKC10048 U1 HYDROGEN SUPPLY SYS REPL		4,604	233,555	202,514	7,298
	WLKC10049 U1 A STATOR OIL PUMP SHAFT REP		22,794	307		
	WLKC10050 U1 BFP SHAFT REPLACE		147,740	10,471		
	WLKC10051 U1 INSTALL HYDROGEN SAMPLE PAN			8,593	5	
	WLKC10052 U1 REPL HYDROGEN PANEL ANNUNCI			13,137	14,345	(277)
	WLKC10053 U1 REPLACE CEMS EQUIPMENT			140,490	19,725	(2,177)

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures  
Requested for the first time in rates

Location	Project Description	July - December 2016	2017	2018	2019	January - March 2020
	WLKC10054 U1 REPLACE BLACKSTART BATTERY				21,823	362
	WLKC20003 U2 Retube B FW Htr			168,824	164,699	
	WLKC20040 U2 REPL GAS LINE COMPONENTS	36,646	2,981			
	WLKC20043 U2 TRAVEL SCREEN REPLACEMENT	150,008				
	WLKC20044 U2 TRANSFORMER REPLACEMENT		50,619			
	WLKC20045 U2 CEMS DATA CONTROLLER REPL		17,913	(42)		
	WLKC20047 U2 COMBUSTIBLE ANALYZER REPLAC			138,049	1,100	
	WLKC20051 U2 INSTALL HYDROGEN SAMPLE PAN			4,314	3	
	WLKC20052 U2 REPL HYDROGEN PANEL ANNUNCI			13,679	9,103	
	WLKC20053 U2 REPLACE CEMS EQUIPMENT			184	53,157	
	WLKC30021 U3 BOILER DUCT EXPANSION JOINT	6,197				
	WLKC30029 U3 RETUBE LUBE OIL COOLERS	361				
	WLKC30030 U3 REPL GAS LINE COMPONENTS	32,272	9,957			
	WLKC30035 U3 CEMS DATA CONTROLLER REPL		17,832	(41)		
	WLKC30036 U3 INSTALL NEW ROOF U3 BOILER		44,208	45		
	WLKC30038 U3 COMBUSTIBLE ANALYZER REPLAC			105,958	14,029	
	WLKC30039 U3 REPL CONDENSER EXP JOINT			62,726	(1,736)	
	WLKC30043 U3 RETAINING RING REPLACEMENT					428,768
	WLKC30044 U3 REWIND TDBFP AUX OIL PUMP M			5,977	4	
	WLKC30045 U3 INSTALL HYDROGEN SAMPLE PAN			2,989	306	54
	WLKC30046 U3 REPL HYDROGEN PANEL ANNUNCI			12,936	6,559	(452)
	WLKC30047 U3 REPLACE CEMS EQUIPMENT			184	47,947	
	WLKC30052 U3 COMB TEMP VAL CTRL CABINETS				2,226	13,649
	WLKC30053 U3 MDBFP MOTOR ROTOR REBAR/REW				14,608	105,421
	WLKCI1002 WLK1 HPRHLP TURBINE OVERHAUL		1,049,989	(75,592)		
	WLKCI1004 WLK1 TSI Replacement	3,613	875,404	(42,212)		
	WLKCI2004 U2 SHRH Outlet BNKHDR Repl	3,698	3,058,927	3,826,510		
	WLKCI3004 U3 SHRH Outlet BNKHDR Replc	2,752,365	4,090,941	1,938		
	WLKCI3007 Wilkes U3 RETUBE E FW HTR	1,570	285,785			
	WLKCI3011 RETUBE WILKES U3 F HP HEATER	207,551	5,051			
	WLKCI3012 U3 TURBINE VIBRATION SYS RPL					160,089
	WLKCI3019 U3 TURBINE CONTROLS				504,532	883,704
<b>Wilkes Plant Total</b>		<b>4,140,429</b>	<b>11,026,363</b>	<b>5,211,919</b>	<b>1,549,762</b>	<b>1,611,331</b>

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
1320 Central Maint Facility SWEPCO	WSX114593 Tooling Contingency New Tools O	335,814.6400
1320 Central Maint Facility SWEPCO Total		335,814.6400
168 SWEPCO Generation	000005264 SEPCo-G Capital Software Dev	8,011,150.3600
	000017845 Alliance RCM Cap Blkt	13,925.6200
	000021554 SWEPCO DHLC/Pirkey Land Acq	580,394.2600
	000025252 2018 Gen Plt Cap Blkt - SEP-G	407,787.8000
	IT1681421 Maximo Imp - SEP - G	2,610,644.3200
	IT168BILL Corp Prgrm Billing - SWEPCO Ge	1,205,653.7200
	REOSWE003 Mobile Test Equipment-SWEGEN	(953.9200)
168 SWEPCO Generation Total		12,828,602.1600
Arsenal Hill Plant	000012163 J.L.Stall @ Arsenal Hill Const	4,957.2400
	ARS5BATTY STATION BATTERY #5	50,481.1700
	ARS5MSHGR Replace U5 Steam Line Hanger	704.1200
	ARS5MVALV PROVIDE PLATFORMS FOR MISC ARE	2,949.3200
	ARS6ABELV Replace elevator control sys	264,177.2100
	ARS6ABT3K Unit 6 Siemens HMI	208,833.5400
	ARS6AHREJ ARS 6A HRSG EXP JOINT	72,749.4400
	ARS6ASCRR Stall U6A SCR Catalyst Replace	752,547.2900
	ARS6B555A 6B Main Steam Non Return Valve	16,153.3400
	ARS6BHREJ ARS 6B HRSG EXP JOINT	75,547.1400
	ARS6BSCRR Stall U6B SCR Catalyst Replace	757,194.8100
	ARS6DEMMB ARS STALL DEMIN MIXED BED	28,046.2200
	ARS6GSUSP STALL SPARE GSU / 6S & 6 AB	1,000,264.1500
	ARS6HOIST ARS STALL UNIT MONORAILS	16,045.2600
	ARS6HVACR STALL AIR CONDITIONING UNIT	43,632.8900
	ARS6OUTCP Stall Outage Capital	158,746.0100
	ARS6STMAJ STEAM TURBINE MAJOR - 6	2,408,292.0500
	ARS6TOOLC ARS6 TOOLS OVER 1K	41,207.8800
	ARSBAYOU1 Stall-Bayou Bank Stabilization	1,391,472.6700
	ARSOUTPPB ARS OUTAGE	34,280.2700
	ARSREOICE REO Ice Machine	5,270.6500
	ARSSRISSU ARS Capital Storeroom Issues	4,469.1900

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	REOSWE008 HVAC Replacement REO	65,315.0900
<b>Arsenal Hill Plant Total</b>		<b>7,403,336.9500</b>
<b>Dolet Hills Plant</b>	DLHCI0033 Construct New Landfill Cell	28,695.1300
	DLHCI0042 DH Rpl Boiler Duct, Insulation	13,043.7800
	DLHCI0043 DHPS-Upgrade Air Heaters	2,769.3000
	DLHCI0044 Rpl Boiler Furnace Lwr Tubing	(169.6300)
	WSX111023 Dolet Hills-Ppb Other Producti	1,460,529.2100
<b>Dolet Hills Plant Total</b>		<b>1,504,867.7900</b>
<b>Flint Creek Plant</b>	000013017 FLC Expansion Joint Replace	463.3100
	000013154 FLC Replace Conveyor Belts	102,474.6200
	000013169 FLC Small Tools Coal Yard	9,384.4200
	000013666 FLC Instrumentation Upgrades	66,155.1500
	000013705 FLC Small Tools Misc	152,402.3400
	000013708 FLC Install New Platform	45,365.7300
	000020379 FLC U1 DBA Conver (CCR/ELG)	401,395.9700
	000021701 FC U1 NOx Mods	(12,425.1000)
	FC001LFEX Flint Creek LF Lateral Exp	1,482.5000
	FLCFGDFAN ID Fan Labor	128,887.5200
	FLCSTATOR FLC Spare Stator Bars	974,388.3500
	FLCU10025 FLC Dumper PLC Upgrade	28,096.1100
	FLCU10156 FLC U1C 4-kV Switchgear Repl	(150.0000)
	FLCU10245 Pump Replacement	55,378.2000
	FLCU10247 FLCU1 Generator Stator Rewind	241,620.5700
	FLCU10261 Misc Valve Replacement	1,182.3000
	FLCU10330 Replace Misc BOP Valves	7,878.0700
	FLCU10417 Yokogawa Probe and Analyzers	2,234.3500
	FLCU10420 Replace Capacitor Bank Swgear	377,945.1900
	FLCU10424 NERC Compliance DDR Req.	238.7500
	FLCU10442 Replace Motor Pump City Lake	10,245.3200
	FLCU10454 Replace Generator Bushings & C	(43.4600)
	FLCU10458 Repl Tripper & Coal Belt Contr	20,208.3500
	FLCU10463 Crowder Family Land Purchase	804.2400

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	FLCU10469 Replace C Pulv Rotating Seg	84,050.6300
	FLCU10472 PULV REPLACE ROLL WHEEL ASSE	129,515.8000
	FLCU10481 HU Diff Relay Replacement	49,449.7300
	FLCU10482 Rep 1k Sootblower 54 12 & 4	13,201.8100
	FLCU10483 Purchase AC VFD for Maint Bldg	(216.5200)
	FLCU10485 Replace NID Recycle Rotary Fee	8,025.0800
	FLCU10486 Primary BA Pond Oil Boom	2,685.1900
	FLCU10489 MOTOR REWINDS	7,820.2500
	FLCU10491 Replace Demin Work Stations	37,756.2000
	FLCU10493 Replace Reheat Attemper Nozzle	9,805.7000
	FLCU10497 Replace ISO Valves NID Cooler	5,298.4700
	FLCU10519 CH 1C Main Feed to Dumper	57,798.3600
	FLCU10520 DISCHARGE CHECK VALVE	1,219.8400
	FLCU10521 Replace Bags in Ash Silo Bagho	11,295.1700
	FLCU10523 Replace 1CH1 Breaker	4,879.6600
	FLCU10528 Replace "B2" Flyash crossover	4,875.5400
	FLCU10529 Replace J- Duct Exhauster	7,489.7700
	FLCU10530 Purchase Motors Over 10H	12,432.1800
	FLCU10531 REPL CONTROLS BUNKER DUST	5,953.0100
	FLCU10534 Pulv Swing Gate Switch and Sol	195,250.5700
	FLCU10535 Pump Replacement	6,235.8900
	FLCU10538 C GSU Cooling Pumps and Valves	121,967.8800
	FLCU10540 Repl "A" Lime Transport Blower	9,409.6800
	FLCU10546 DCS Controls Switch Upgrade	7,689.8600
	FLCU10548 CSP Pumps	31,821.0100
	FLCU10553 Replace Pinion Gear At Dumper	2,919.1000
<b>Flint Creek Plant Total</b>		<b>3,444,242.6600</b>
<b>Knox Lee Plant</b>	ARCFLA168 Arc Flash Protectn Swi SWEPCO	1,133.8500
	KXL0CM001 Small Tools and Misc Equipment	103,575.5100
	KXL0CM006 KXL U0 Replace Oil Booms	164.3200
	KXL0CM025 KXL U0 Admin Offices	783,694.1500
	KXL0CW007 Replace Chlorinator Skid	116,912.6700



SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	KXL0CW008 KXL U0 Reverse Osmosis System	125,114.2200
	KXL5CB003 KXL U5 Boiler Gas Header Vlvs	305,754.1700
	KXL5CB009 KXL U5 Boiler Lighting	(128.8500)
	KXL5CB010 KXL U5 Replace Air Compressor	96,975.8200
	KXL5CD008 KXL U5 Annunciator Controls	11,535.3900
	KXL5CD009 KXL5 AMMONIA INJECTION SYSTEM	92,564.1500
	KXL5CE003 KXL U5 NERC Relays Replacement	10,711.4100
	KXL5CE007 KXL5 U5 RELAY	6,147.4400
	KXL5CG004 Replace Generator Leads U5	176,925.1300
	KXL5CH002 KXL U5 Air Heater Seals Rpl	190,118.5300
	KXL5CM004 KXL U5 Expansion Joint Upgrade	97,021.8700
	KXL5CM014 KXL U5 TDL Laser Analyzer	197,160.7900
	KXL5CM021 KXL 5 USED Oil Storage Tank	8,878.7300
	KXL5CV004 KXL U5 SW Piping	73,314.1100
	KXL5CW001 KXL U5 Service Water Pump	2,926.5000
	KXL5CW002 KXL U5 Boiler Silica Analyzer	14,884.1900
	NRCPSWPCO NERC CIP SWEPCO	4,682.7500
	SWE168RTU SWEPCO Gen RTU Upgrade	3,880.6400
<b>Knox Lee Plant Total</b>		<b>2,423,947.4900</b>
<b>Lieberman Plant</b>		
	LBM0CCOOL Turbine Lube Oil Cooler	303,847.2500
	LBM0CCTFL Comp. Turbine Floor Lighting	55,208.3800
	LBM0CG202 Water Treatment Building	9,127.2700
	LBM0CGATE Entrance Gate Replacement	12,942.0000
	LBM0CM101 U0 Valve Replacement/Upgrades	295,448.8100
	LBM0CM104 U0 Small Tools & MiscEquipment	31,446.4500
	LBM0CN100 U0 CATHODIC PROTECTION	(3,725.7500)
	LBM0CT200 Replacement of Transformer	329,983.6000
	LBM0CT201 Lighting Transformer	24,652.2900
	LBM0CTTRAN Replacement of Transmitters	6,055.1900
	LBM3CPIRB U3 Pilot Igniter Rebuild	127,851.3700
	LBM3CPUMP U3 Boiler Chemical Pump	147.1100
	LBM4CHTWL Upgrading Hot Well Controls	845.2100

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	LBM4CPIRB U4 Pilot Igniter Rebuild	30,177.3400
	LBMALARM Alarm System	23,029.8900
<b>Lieberman Plant Total</b>		<b>1,247,036.4100</b>
<b>Lone Star Plant</b>	LNS000611 Capital PPB - Misc Project	(46,036.4800)
<b>Lone Star Plant Total</b>		<b>(46,036.4800)</b>
<b>Mattison Plant</b>	000014768 TON Plant Improvements	31,295.1800
	HDMU00002 HDM Small Tools	3,544.9700
	HDMU00074 Construct Maintenance Building	177,815.4700
	HDMU00075 Purchase Capital Tools	13,759.7500
	HDMU00076 GE Stationary Blade Replace	473,407.0100
	HDMU40012 Set of CT Transition Pieces	619,310.1400
<b>Mattison Plant Total</b>		<b>1,319,132.5200</b>
<b>Pirkey Plant</b>	000026191 PRK CCR/ELG Compliance	1,814,669.5500
	PRK10C220 CY CONVEYOR BELTS	67,593.9100
	PRK10C251 PULV GRINDING TABLES BOWL	204,331.2700
	PRK10C302 Boiler Duct Exp Joints	56,084.0400
	PRK12C704 PRK Controls BMS CC	5,365,607.3920
	PRK13C600 Precip Rappers	21,730.3800
	PRK14C810 ASH ECON ASH	10,211.8300
	PRK18C001 CAP OUTAGE < \$100K	(1,516.6600)
	PRK18C002 CAP NON-OUTAGE <\$100K	11,648.0700
	PRK19C001 CAP OUTAGE < \$100k	737,138.0300
	PRK19C002 CAP NON-OUTAGE < \$100K	902,368.6500
	PRK20C002 CAP NON-OUTAGE <\$100K	116,874.7600
	PRKCAHT61 PAH SUPPORT/GUIDE BEARING	91,088.9000
	PRKCBLR60 BOILER HEADER INSULATION	45,149.7500
	PRKCCNT01 RVP CONTROL CARDS	10,673.8700
	PRKCCNV02 CONVEYOR PULLEY REPLACEMENT	19,690.2200
	PRKCCYD03 A1 OR A2 RING GRANULATOR REBUI	35,585.0100
	PRKCDDEM00 Demin Analyzers	37,033.5800
	PRKCFDR01 STOCK FEEDER BELTS	3,978.4400
	PRKCFGD51 FGD Valves Recycle	31,994.8100

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	PRKCFGD60 FGD CONTROLS UPGRADE	3,778,091.2300
	PRKCRLY01 RELAYS FOR DME	170,040.7400
	PRKCSFD01 STOCK FEEDER BELTS	9,062.2500
	PRKCSLG02 A FILTER CAKE VACUUM DRUM REPL	(35,187.9500)
	PRKCWTR02 POND EVAPORATOR INSTALL	623,694.8700
	PRKPSC223 R/R 2019	100,114.9000
	PRKXENV01 Pirkey Landfill Area K Cell 1	1,034,077.1700
	PRKXENV03 PRK Landfill Expansion	61,808.3500
	PRKXFAN50 ID Fan Blades B	495,673.4600
	PRKXGEN51 CI VOLTAGE REGULATOR	137,768.8900
<b>Pirkey Plant Total</b>		<b>15,957,079.7120</b>
<b>Turk Plant</b>		
	TRKAPEXBU TRK MATS REDUNDANT APEX BACKUP	101,972.0900
	TRKBAYLIT TRK TURBINE HI BAY LIGHTS	29,707.2300
	TRKBLRHVA TRK HVAC BOILER SAMPLE ROOM	6,038.3600
	TRKC2BELT TRK CONVEYOR 2 BELT REPLACEMEN	115,763.5300
	TRKC5BELT TRK CONVEYOR 5 BELT REPLACEMEN	89,912.7200
	TRKCANNON TRK SCR AIR CANNONS	30,272.0000
	TRKCOALYD TRK MISC COAL EQUIP	4,452.1600
	TRKCOGLTK TRK WWTP COAGULANT STRG TANK	9,461.4100
	TRKCVBELT TRK COAL CONV BELT REPLACEMENT	85,530.3500
	TRKCYCRIC TRK CY RECLAIM TUNNEL CRICKETS	667,702.9000
	TRKCYELEV TRK COAL YARD ELEVATOR CRUSHER	42,331.7200
	TRKFLAHR TRK RAS FLUIDIZING AIR HEATER	6,812.9100
	TRKFURNTR TRK OFFICE FURNITURE	3,638.6300
	TRKGAITON TRK GAITRONICS SYSTEM	10,323.5400
	TRKGENPLF TRK GENERAL PLATFORMS	90,684.5500
	TRKGENUPS TRK PLANT UPS UPGRADES	3,126.4900
	TRKHEATTR TRK WT HEAT TRACE INST CONTROL	163.3300
	TRKHVACCN TRK HVAC CONTROL SYS FOR ADMIN	45,392.3600
	TRKIDFNCL TRK #1 ID FAN LUBE OIL COOLER	13,881.9900
	TRKMOTORS TRK MISC MOTORS	36,023.1200
	TRKMOWR19 TRK NEW EXMARK MOWER ZERO TURN	8,761.7500

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	TRKMSCPBB TRK MISC PPB PROJECTS	374,962.2500
	TRKPLGRZO TRK PLVR GRINDING ZONE REPLACE	199,171.5900
	TRKPLTRAN TRK PLANT TRANSMITTERS	50,750.7800
	TRKPRESBL TRK PRESSURE BLOWER 1 N 1CP	899.6200
	TRKPULVER TRK PULVERIZER WHEEL REPLAC	2,493.2500
	TRKPUMPSO TRK MISC PUMPS	13,910.5400
	TRKRAILR2 Turk Rail Replacement	4,171,468.6400
	TRKRCDAC1 TRK CY RCD AC UNIT	10,290.2000
	TRKSAFETY TRK SAFETY ENHANCEMENTS	2,725.3600
	TRKSBCONT TRK SOOTBLWR HYDROJET CONTROLS	3,984.5800
	TRKSCRHR1 TRK SCR ACOUSTIC CLNR 1 & 2 LY	61,733.0800
	TRKSLKHTR TRK LIME SLAKER 1 HTR RECTFR	7,044.9800
	TRKTOOLS0 TRK TOOLS MISC	163,819.9300
	TRKTRBAVR TRK MAIN & BFP TRB AVR CONT UP	351,008.1800
	TRKUPGRAD TRK MISC UPGRADES	4,176.7600
	TRKVALVES TRK PPB MISC VALVES	37,500.5000
	TRKVFDDRV TRK CONST ELEV VARI AC DRIVES	812.3400
<b>Turk Plant Total</b>		<b>6,858,705.7200</b>
<b>Welsh Plant</b>	000020364 WSH U0 DBA Conversion	937,832.7300
	WSHCU0003 WSH U0 Parts Sox Under 50K	58,791.9300
	WSHCU0009 WSH U0 Ultra Filter Membranes	169,760.9800
	WSHCU0019 WSH U0 Coal Car Dumper Replace	40,379.4700
	WSHCU0024 WSH U0 Small Tools	311,068.1600
	WSHCU0025 WSH U0 RO Membrane	7,604.1500
	WSHCU0042 WSH U0 COAL YARD 4KV FEED JH	426,348.9700
	WSHCU0102 WSH U0 COAL YARD CONVEYOR BELT	194.9600
	WSHCU0103 WSH U0 COAL YARD MOTORS	114,314.0300
	WSHCU0104 WSH U0 COAL YARD GEARBOXES	5,345.7400
	WSHCU0106 WSH U0 CAPITAL INSTRUMENTATION	2,503.3500
	WSHCU0107 WSH U0 PUMP REPLACE/OVERHAUL	87,298.2600
	WSHCU0108 WSH U0 CAPITAL MOTOR REWINDS	486.2200
	WSHCU0114 WSH U0 CONVEYOR CONTROL SYSTEM	1,673.4600

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	WSHCU0117 WSH U0 TRIPPER CONTROLS	170,251.4700
	WSHCU0120 WSH U0 ASH POND LAND ACQUISTIO	4,552.1800
	WSHCU1003 WSH U1 Parts Sox Under 50K	410,635.5000
	WSHCU1004 WSH U1 Replace Clinker Grinder	(32,211.2800)
	WSHCU1005 WSH U1 Pulv Cmpnt Changeout	331,100.1200
	WSHCU1007 WSH U1 CSP Contractor Labor	89,620.1900
	WSHCU1028 WSH U1 Capital Motor Rewinds	38,426.6300
	WSHCU1029 WSH U1 Valve Replacement	321,353.1700
	WSHCU1030 WSH U1 Platforms	112,745.8500
	WSHCU1053 WSH U1 Pump Rep/Cap Overhaul	291,125.2600
	WSHCU1107 WSH U1 CAPITAL INSTRUMENTATION	4,313.3900
	WSHCU1108 WSH U1 SEL 487E RELAY/COMPUTER	1,957.8100
	WSHCU1110 WSH U1 BYPRODUCT DRY UNLOADING	6,197.2700
	WSHCU1113 U1 FABRIC FILTER OPACITY MONIT	126,081.6200
	WSHCU3003 WSH U3 Parts Sox Under 50K	77,406.9200
	WSHCU3005 WSH U3 Pulv Cmpnt Changeout	539,458.2000
	WSHCU3007 WSH U3 CSP Contractor Labor	26,861.2300
	WSHCU3028 WSH U3 Capital Motor Rewinds	46,293.0800
	WSHCU3029 WSH U3 Valve Replacement	66,594.0200
	WSHCU3030 WSH U3 Platforms	26,359.3600
	WSHCU3049 WSH U3 Expansion Joints Boiler	40,601.6900
	WSHCU3053 WSH U3 Pump Rep/Cap Overhaul	280,969.6900
	WSHCU3110 WSH U3 CAPITAL INSTRUMENTATION	7,300.4200
	WSHCU3111 BYPRODUCT DRY UNLOADING SYS	4,883.5800
	WSHCU3113 U3 FABRIC FILTER OPACITY MONIT	163,155.0600
	WWSHPPBNB WSH Capital Non-Budgeted	1,528,757.5500
<b>Welsh Plant Total</b>		<b>6,848,392.3900</b>
<b>Wilkes Plant</b>	WLKC00004 Miscellaneous Tools and Equip	197,598.1400
	WLKC00105 PLATFORMS	(505.4800)
	WLKC00106 WLK CATHODIC PROT NAT GAS LINE	10,668.0700
	WLKC00111 U0 WILKES PI SERVERS INSTALL	4,506.5600
	WLKC00114 REPL TRANSFORMER AT LODGE	(64.5100)

SOUTHWESTERN ELECTRIC POWER COMPANY  
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
WLKC00115	U0 INTRASITE COMMUNICATION INS	56.9700
WLKC00116	REPLACE LODGE FLOOR	(1,943.1800)
WLKC00117	U0 DEMIN RESIN REPLACEMENT	24,290.1100
WLKC00118	U0 PAVE PLANT ROAD ENTRANCE	92,323.4400
WLKC00119	REPLACE ALL CABIN WINDOWS	18,802.2100
WLKC10048	U1 HYDROGEN SUPPLY SYS REPL	76,262.5000
WLKC10051	U1 INSTALL HYDROGEN SAMPLE PAN	(163.5100)
WLKC10052	U1 REPL HYDROGEN PANEL ANNUNCI	9,985.0700
WLKC10053	U1 REPLACE CEMS EQUIPMENT	63,798.8700
WLKC10054	U1 REPLACE BLACKSTART BATTERY	4,366.3000
WLKC20003	U2 Retube B FW Htr	129,262.0900
WLKC20052	U2 REPL HYDROGEN PANEL ANNUNCI	908.2700
WLKC20053	U2 REPLACE CEMS EQUIPMENT	11,124.7500
WLKC30043	U3 RETAINING RING REPLACEMENT	428,767.6500
WLKC30045	U3 INSTALL HYDROGEN SAMPLE PAN	301.2400
WLKC30046	U3 REPL HYDROGEN PANEL ANNUNCI	1,536.8400
WLKC30047	U3 REPLACE CEMS EQUIPMENT	11,447.0100
WLKC30052	U3 COMB TEMP VAL CTRL CABINETS	15,874.4800
WLKC30053	U3 MDBFP MOTOR ROTOR REBAR/REW	120,029.4800
WLKCI3012	U3 TURBINE VIBRATION SYS RPL	160,089.3100
WLKCI3019	U3 TURBINE CONTROLS	1,388,235.8400
<b>Wilkes Plant Total</b>		<b>2,767,558.5200</b>